

A green-tinted sketch of a park scene. In the foreground, there are stylized trees and foliage. In the background, a building with a large arched entrance is visible. Several small figures of people are scattered throughout the scene, including one near the archway and others in the foreground. The overall style is a loose, artistic sketch.

NUTFIELD GREEN PARK

PLANNING STATEMENT

OCTOBER 2023



Planning Statement Nutfield Green Park

October 2023



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1.0 INTRODUCTION

- 1.1 This Planning Statement has been prepared by hgh Consulting on behalf of Nutfield Park Developments Limited (Ltd) (*the Applicant*) in support of an outline planning application at the Former Laporte Works Site, Nutfield Road, Nutfield (*the Site*) submitted to Tandridge District Council (*the Council or TDC*) for the following proposed development:

“Outline planning permission for the development of the site for new homes (Use Class C3) and Integrated Retirement Community (Use Classes C2, E(e), F2), creation of new access, landscaping and associated works to facilitate the development, in phases which are severable (Outline with all matters reserved, except for Access).”

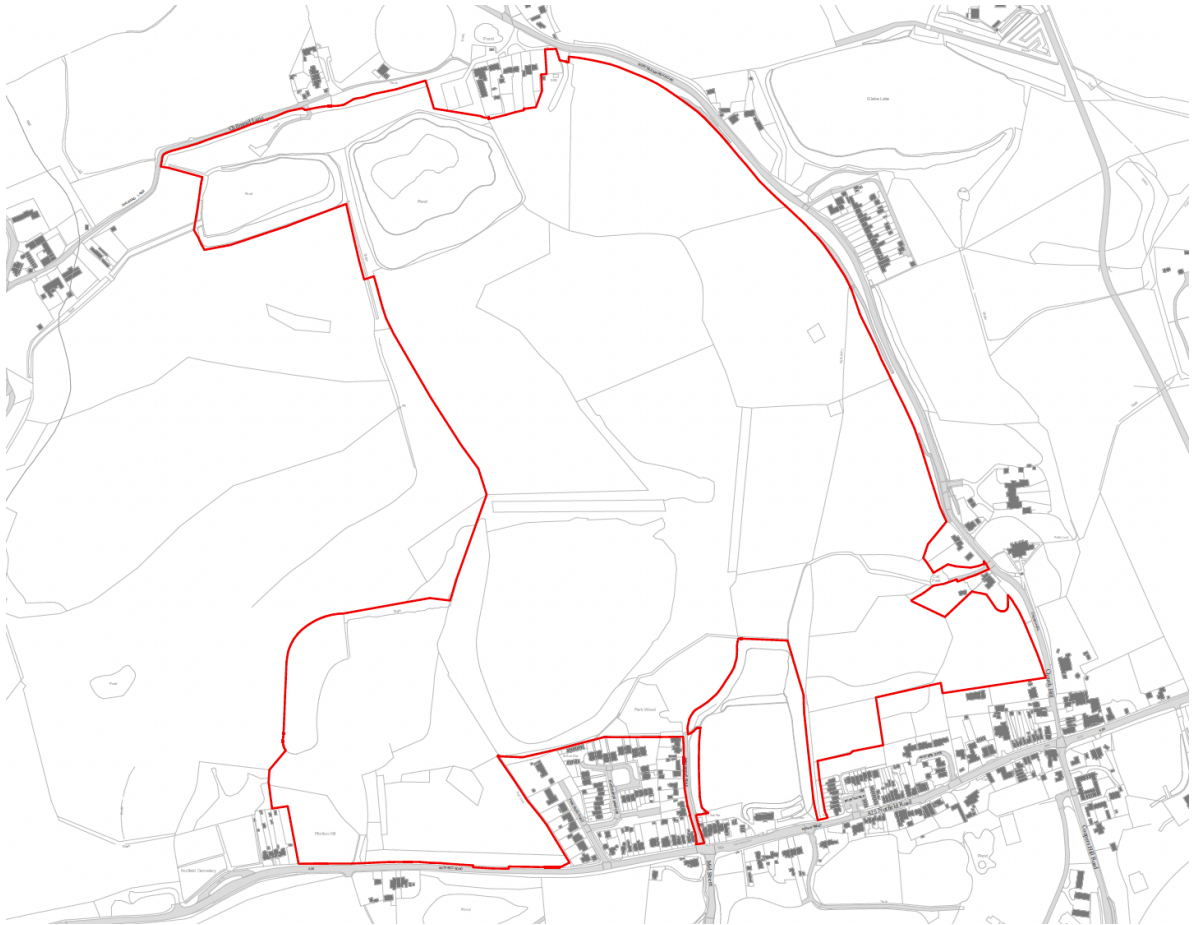
The Applicant

- 1.2 Nutfield Park Developments Ltd are committed to creating a highly sustainable community whilst delivering significant environmental enhancements on the site for the benefit of existing residents, as well as future residents and for the local area. The Applicant’s vision for the scheme is to achieve high standards of design and sustainability to ensure positive contributions to the area, delivering a beautiful, healthy and enjoyable place to live, work and visit.
- 1.3 The Applicant team are based locally in Surrey and comprise a range of experience and expertise in housebuilding, land remediation / restoration and sustainable drainage systems making them suitable to lead, deliver, and manage the development now and in the future.
- 1.4 Importantly, the Applicant will provide long term stewardship of the development and the wider site. This will create long-term governance and self-sustaining community stewardship for the management and maintenance of the community assets, including all open space and the woodlands, as well as design coding of the self-build elements of the proposed development.

The Site

- 1.5 The Site is located in TDC and comprises a mixture of grassland, blocks of self-seeding woodland, and waterbodies with an area of the former infrastructure remains to the south of the Site from the historic minerals and landfill works of the former Laporte Works. The Site Location Plan is shown in Figure 1 below.

Figure 1: Site Location Plan



Outline Planning Application

- 1.6 This Planning Statement provides an assessment of the planning merits of the proposals in relation to the statutory Development Plan and other material considerations. The planning application seeks outline approval for the principle of residential development on the Site and detailed approval for the creation of a new vehicular and pedestrian junction on Nutfield Road (A25) to provide access to the new development areas. Other matters relating to scale, appearance, layout and landscaping are reserved for subsequent detailed approval.
- 1.7 A phasing condition requiring a phasing plan, that will set out the details of the component severable parts of the development is to be attached to a planning permission. The phasing plan will be submitted and approved in writing by the Local Planning Authority before any works in connection with the development commences.

- 1.8 This Statement provides a reasoned justification which robustly demonstrates that the very considerable planning benefits that will be generated by the development scheme clearly outweigh the harm by reason of inappropriateness to the Green Belt and other harms have been demonstrated and planning permission should be granted. It sets out how the proposed development will deliver a range of much needed high quality designed homes, including private, affordable, retirement and extra care units, with supporting Classes E and F floorspace, against a prevailing (impending) policy vacuum, in the absence of an up to date Development Plan, and the absence of a five year housing land supply.
- 1.9 The proposed development will deliver significant public benefits which carry very significant weight in favour of the proposal, including above policy requirement levels of affordable housing provision (of approximately 36% across all Use Class C3 housing) and ecological enhancement, and a significant biodiversity net gain (of approximately 22.22%). Alongside the other considerable benefits of the proposals these ‘*other considerations*’ provide the justification necessary to demonstrate that substantial benefits exist to clearly and demonstrably outweigh the definitional harm to the Green Belt and limited harm identified to the openness and purposes of the Green Belt. The proposed development relates to only 7ha (approx. 12%) of the total 58.8ha site area.
- 1.10 This Planning Statement should be read in conjunction with all supporting plans and documents submitted with the planning application which are set out in the below table.

Table 1: Supporting Documents and Plans

Report	Consultant
Application form	hgh Consulting
Site Location Plan	Adam Architecture
Illustrative Masterplan	Adam Architecture
Parameter Plan: Land Use Plan	Adam Architecture
Parameter Plan: Access and Movement Plan	Adam Architecture
Parameter Plan: Green and Blue Infrastructure	Adam Architecture
Parameter Plan: Building Heights Plan	Adam Architecture
Components Plan	Adam Architecture
Design and Access Statement	Adam Architecture
5 Year Housing Land Supply Note	Emery Planning
Affordable Housing Topic Paper	Tetlow King
Older Persons Needs Topic Paper	Tetlow King
Self-Building and Custom Housebuilding Topic Paper	Tetlow King
Statement of Community Involvement	Lexington
Biodiversity Checklist	FPCR

Ecological Impact Assessment (including Biodiversity Net Gain Assessment at Appendix L)	FPCR
Biodiversity Net Gain Metric (Excel Spreadsheet)	FPCR
Arboricultural Assessment	FPCR
Landscape and Visual Appraisal and Green Belt Assessment	FPCR
Energy & Sustainability Statement	QODA
Utilities Feasibility Report	QODA
Air Quality Assessment	Air Quality Consultants
Transport Assessment	Vectos (Part of SLR)
Framework Travel Plan	Vectos (Part of SLR)
Copenhagen Crossing Style Junction Plan	Vectos (Part of SLR)
Site Investigation	MJCA
Flood Risk Assessment and Drainage Strategy	Waterman
Heritage Statement	Andrew Josephs Associates
Planning Noise Assessment	Noise Solutions
Social Infrastructure Assessment	Turley Economics
Economic and Social Benefits Statement	Turley Economics

Structure of Statement

1.11 This statement is structured as follows:

Section 2 provides a description of the site and surrounding area;

Section 3 describes the planning history of the site;

Section 4 sets out the pre-application process and engagement undertaken;

Section 5 provides a description of the application proposals;

Section 6 provides a summary of national and local planning policy and guidance of relevance to the proposals;

Section 7 examines the planning considerations for the assessment of the proposed development; and

Section 8 provides the Planning Balance and conclusions in respect of the proposals.

2.0 SITE AND SURROUNDINGS

The Site

- 2.1 The whole Site measures approximately (approx.) 58.8 hectares (ha). It is located to the north of the A25 Nutfield Road, west of Cormongers Lane, south and west of Nutfield Marsh Road, south east of Chilmead Lean, west of Church Hill and to the immediate north of the village of Nutfield.
- 2.2 The Site comprises a mixture of grassland, blocks of self-seeding woodland and waterbodies in the northern part of the Site with an area of the former infrastructure remains to the south of the Site including access roads and pipework and former settlement lagoons. The Site is partially publicly accessible with several public rights of way (PROW) footpaths throughout. An aerial photograph shows the Site below in Figure 2.

Figure 2: Aerial Photograph of the Site with estimate outline of Site boundary in red



- 2.3 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, as late as 1986. The Site was decommissioned in 1997.
- 2.4 Figure 3 below is an aerial photo of the Site from 1971 showing the extent of the mineral works. The "Park Works" annotation highlights the location of the existing former remains.

Figure 3: Aerial Impact of the Site in 1971



The Surroundings

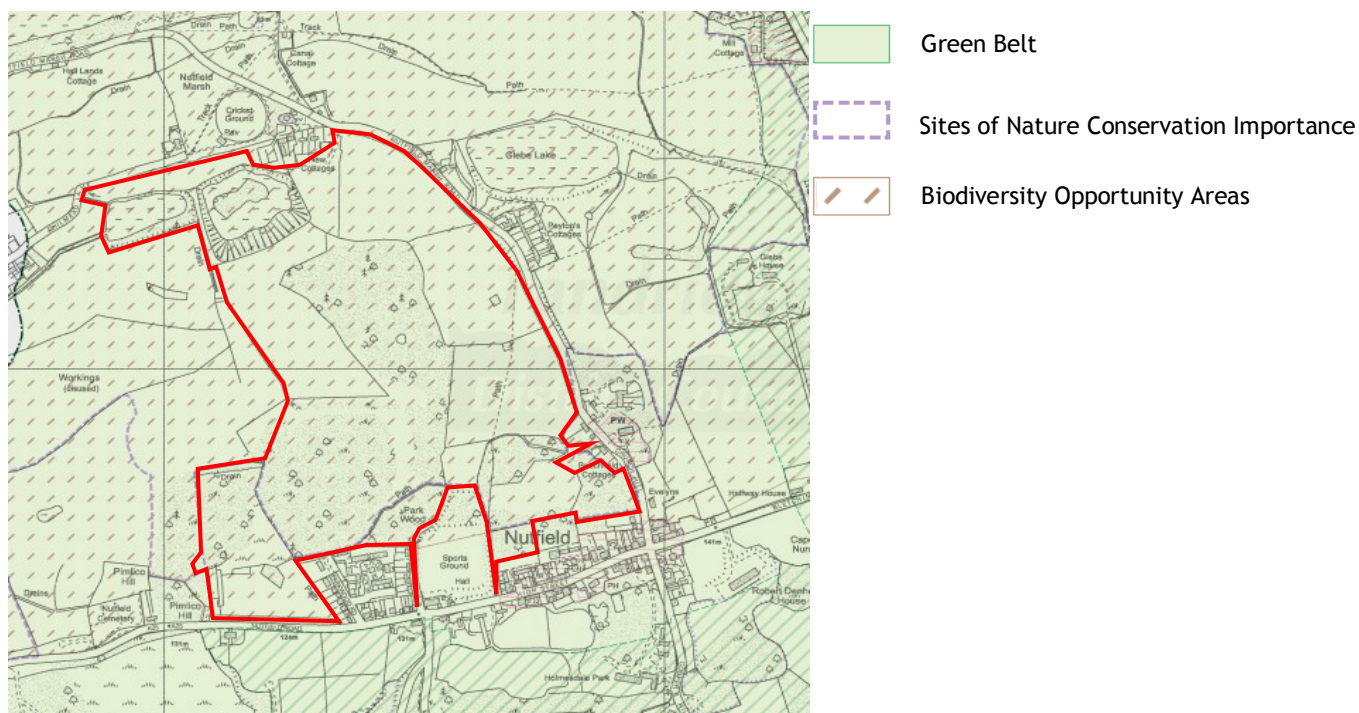
- 2.5 Nutfield, directly south of the Site, primarily comprises residential dwellings, with a mixture of house types including larger detached houses and terraced houses, up to 2-storeys in height. Some local services such as a pub and veterinary clinic are located along the high street.
- 2.6 The surrounding area also comprises a landfill and mineral sites. The Patteson Court Landfill Site is located to the west of the Site, lying immediately west of Cornmongers Lane. Mercers South Quarry is an active minerals site situated northeast of the Site.
- 2.7 Redhill is the nearest town to the Site, approx. 1.5 miles west. Redhill is accessed via the A25 from the Site, which is a 3-minute drive, 13-minute bus, or an 8-minute cycle. Redhill comprises a town centre providing a range of services including supermarkets, retail shops, restaurants, bars and importantly the Railway Station. Redhill Railway Station is served by Great Western Railway, Thameslink, and Southern Railway, providing direct services to London Bridge (c. 30-minute journey time), Three Bridges, Reading, Reigate, Peterborough, Tonbridge, Horsham and more.

- 2.8 Nutfield benefits from bus services including routes 400, 410, 410A, 610, 612 and the 315 bus. The buses provide direct services to Caterham, Holland, Domewood, Dormansland. The 400 and 410 bus routes provide direct access to the centre of Redhill within approx. 13-minutes.

Designations

- 2.9 According to TDC's Planning Policy Map (2018), the Site is subject to the following designations. Figure 4 shows an extract of the Planning Policy Map outlining the approximate site location in red.
- a) Green Belt;
 - b) Sites of Nature Conservation Importance; and
 - c) Biodiversity Opportunity Areas.

Figure 4: Extract of TDC Planning Policy Map



- 2.10 The Surrey Hills AONB lies approx. 0.7km to the north west of the Site. Extensions to the AONB are currently being considered but the Site does not lie within any of these potential extension areas. The Quarry Hangers Sites of Special Scientific Interest (SSSI) is located approx. 3.5km to the northeast of the Site. The Mole Gap to Reigate Escarpment Special Area of Conservation (SAC) is located approx. 3.8km to the north west of the Site. The Mole Gap to Reigate Escarpment SPA is 1km further at 4.5km to the north west of the Site.
- 2.11 The Site is not located within or adjacent to a Conservation Area. No listed buildings are located within or immediately adjacent to the Site. Four Grade II and one Grade II* listed buildings are located within the built up area of Nutfield Village, including 40-44 High Street (Grade II), The Queens Head Public House (Grade II), Folly Tower In Grounds of Redwood (Grade II), and Church of St Peter and St Paul (Grade II*).

- 2.12 The Site is located within the Environmental Agency's Flood Zone 1, which is defined as having a less than 1 in 1,000 annual probability of river or sea flooding.

3.0 PLANNING HISTORY

- 3.1 A desk-top review of the Council's online planning database has been undertaken and a summary of the Site's planning history is outlined below.
- 3.2 On 18 July 2023, the Council confirmed that Environmental Impact Assessment is not required for this proposed development (ref: TA/2023/737/EIA). The EIA Screening Opinion is enclosed at Appendix 1 of this Statement.
- 3.3 The most recent and relevant planning history is an outline planning application which was submitted in May 2021 for the following proposed development (ref: TA/2021/1040):

“Outline application (including details of means of access and layout) for the construction and operation of Nutfield Green Park with access from Nutfield Road and Nutfield Marsh Road comprising the construction of an outdoor activity park using imported inert materials, the operation of an outdoor activity park, the construction and operation of an associated wellbeing centre (GP surgery, pharmacy, community diagnostic hub, community shop, restaurant/café, creche, office hub, event space, indoor and outdoor gyms together with ancillary uses such as 2 staff accommodation units, treatment rooms and storage) together with development of up to 239 residential units, a 70 bedroom rehabilitation and respite care facility with an associated up to 100 extra care units and staff accommodation for up to 21 staff together with infrastructure, landscaping and open space at the Former Laporte Works, Nutfield.”

- 3.4 The previous application was refused by the Council on 21 September 2021, with 20 reasons for refusal attached to the decision notice. The reasons for refusal have informed the revised approach to the development of the site proposed by the proposed development. Appendix 2 of this Statement sets out how each reason for refusal has been addressed by this fresh application.
- 3.5 Other planning history relating to the Site dates back to before 1998 and is set out in summary below:
 - a) **98/1148:** Construction of 0.25m diameter pipeline to transport aviation fuel between Pendell and Gatwick airport together with associated accommodation works and above ground installation (agi). Granted 20 May 1999.
 - b) **95/535:** Scheme of fullers earth working & restoration of an area of about 7.3 ha involving permanent diversion of public footpath 195 & construction of a temporary bridge over Cormongers Lane, submitted pursuant to cond. 1 of planning permission 1544/621/4/2108/9/3 issued by minister of housing & local government on 29/7/54. Withdrawn 24 August 1995.
 - c) **93/75:** Details of scheme of fullers earth extraction, restoration and maintenance of site pursuant to ministers original decision in 1954. Withdrawn 15 February 1993.
 - d) **89/1192:** Use of land for general industrial & warehousing (application for established use certificate). Not in Plus6¹ 22nd May 1990

¹ Direct quote from the planning register

- e) **GOR/7336:** Residential development. Refused 10th February 1966.
- f) **GOR/3396:** Use of about 8 acres of land for the purpose of a tip for overburden. Approved 3rd December 1958.
- g) **GOR/452:** Factory. Withdrawn 5th February 1952.

3.6 These historic applications are not considered relevant to the determination of this outline planning application submission.

4.0 PRE-APPLICATION ENGAGEMENT

Statutory Engagement

Planning

- 4.1 A preliminary pre-application meeting was held on 30 September 2022, attended by the Interim Chief Planning Officer at the time and the Pre-applications Manager. This meeting discussed the principle of an amended planning application, which would address the previous reasons for refusal and how this could, in the interim, support the Council's spatial development strategy in light of the on-going delays at the time with the draft new Local Plan, housing delivery test position (substantial shortfall - presumption) and lack of a five year housing land supply. The meeting was not subject to detailed design review as no scheme details were presented at the time.
- 4.2 As an informal meeting, no formal pre-application written advice was received from TDC. A summary of the meeting is set out below:
- a) Officers recognised the significant shortfall in the 5 year housing land supply (5YHLS) and Housing Delivery Test (HDT);
 - b) Officers realised that the Council cannot place sole reliance on a number of allocated "non contentious" sites in the current plan;
 - c) Officers were interested in the ethos and long-term stewardship role/aspiration of the applicant;
 - d) Moving forward, the Council wants to bring in highways/transport and housing/affordable housing officers into the discussions;
 - e) BNG will be key to the proposed scheme and off-setting environmental and ecological benefits that could be delivered from the development itself and elsewhere in the District; and
 - f) Public accessibility will also be a benefit, but the type and level of use needs to avoid encouraging the site as a destination but ensure that the local community benefits from access to the site/open space.
- 4.3 Despite several months hiatus due to changes in Council personnel, a further informal meeting was arranged to discuss the emerging scheme and EIA Screening Request. A positive meeting was held with a new Interim Head of Planning and the Enabling Housing Development Manager on 20 July 2023. The meeting primarily focussed on the EIA Screening Request, prior to the issue of the Council's formal response, and on-going difficulties and delays with the draft new Local Plan. The Enabling Housing Development Manager welcomed, in principle, the provision of on-site affordable housing to meet an identified and increasing unmet need in the District. At the meeting affordable housing tenures, including First Homes, were also discussed.
- 4.4 As an extension of the meeting with officers on 20 July 2023, Tetlow King, the Applicant's affordable housing consultant, have led further discussions with the Council Housing Officer, regarding the provision and tenure of affordable housing proposed. These informal discussions have sought to explore the proposed affordable housing offer to be presented at this outline application stage and how this on-site provision may be tailored to meet the Council's specific needs.

- 4.5 Further analysis of the affordable housing provisions of the proposed development is discussed at Section 7 of this statement.

Highways

- 4.6 Vectos, the project's highways consultant, attended a pre-application meeting with Surrey County Council (SCC) on Friday 17 March 2023 and have since been working collaboratively together. SCC returned a formal response on 12 May 2023, as shown in Appendix A of the Transport Assessment. A highways response note was issued to SCC by Vectos on 4 August 2023 addressing each of the comments raised, as shown in Appendix B of the Transport Assessment.
- 4.7 The second pre-application meeting with SCC was held on 30 August 2023. Notes from this meeting are enclosed at Appendix C of the Transport Assessment. SCC's recommendations have been taken into account in the formulation of this planning application, the specifics of which are detailed within the Transport Assessment.

Drainage

- 4.8 Waterman, the project's drainage consultants, attended a pre-application meeting with Surrey County Council (SCC) (Lead Local Flood Authority) on 25th July 2023. A summary of the meeting was provided by Waterman outlining further details to be demonstrated and included within the submitted Flood Risk Assessment (FRA) and Drainage Strategy (see Appendix E of the FRA), which raised no objection to these matters.
- 4.9 Since this meeting, SCC have provided a Detailed Flood Risk Report (8 August 2023) advising on the risk of flooding and SuDS requirements for the Site. SCC have also reviewed the first draft of the FRA. The comments received are detailed at Table 1 of the FRA and have been considered within the preparation of the final FRA and Drainage Strategy supporting this outline planning application.

Contamination

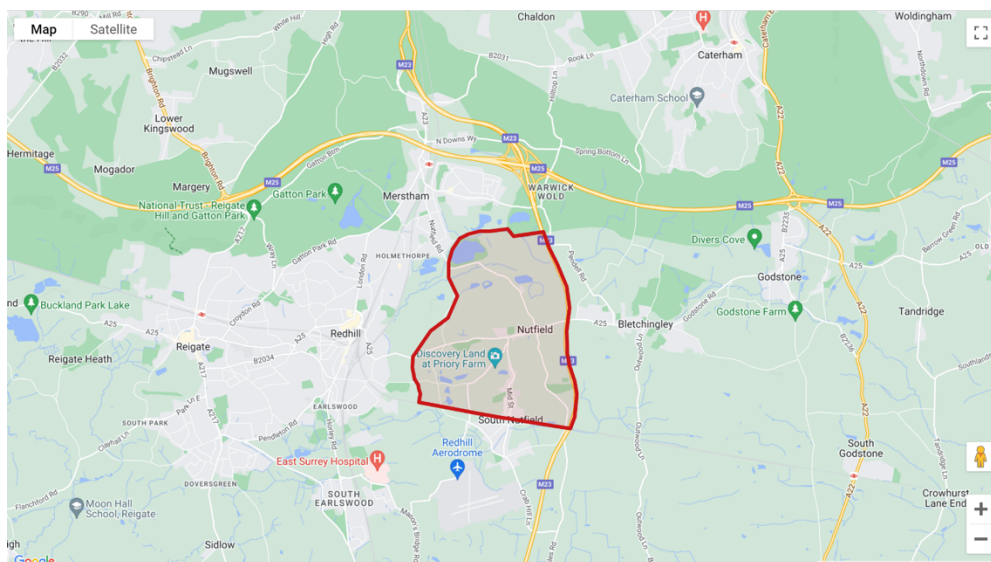
- 4.10 MJCA, the project's ground conditions consultants, has engaged with the Council's pollution control officer throughout the extensive pre-submission investigation work that has been undertaken. The officer was consulted on the scope of the site work prior to the 2023 site investigation. The Environmental Protection Group Limited (EPG) were commissioned on behalf of TDC to review and comment on the investigation proposals. Both TDC and EPG have reviewed the accompanying report prior to the submission of this application.
- 4.11 On behalf of TDC, EPG issued their review of the accompanying report within a letter dated 8 September 2023. The review concludes that:
- “Overall EPG are satisfied that suitable exploratory investigations and preliminary assessments have been completed and that the risks can be appropriately mitigated via planning conditions.”*
- 4.12 The letter details further assessments to be carried out at detailed design stage and the consultant team are engaging with EPG to confirm the scope of such further assessments to be secured by suitably worded planning conditions. The letter from EPG is enclosed at Appendix 3 of this Statement.

- 4.13 Further details of this engagement are outlined with the accompanying Site Investigations Report by MJCA.

Public Engagement

- 4.14 During the early design phase whilst technical work was underway, the Applicant undertook a snapshot survey, using social media to understand what the community across Tandridge believes they need through development. A detailed summary of the approach and the findings can be found in Appendix A of the SCI.
- 4.15 This survey comprised a series of adverts encouraging wider segments of society (including hard to reach groups as defined by the borough) were targeted via Facebook, to help ascertain key drivers and considerations for the project team. This resulted in over 140,000 impressions on Facebook, funnelling down to 1,395 visits to the futureoftandridge.co.uk website, where 56 people were passionate about responding to the survey.
- 4.16 Following this initial survey, residents, community groups, and businesses in close vicinity to the Site were notified of the public consultation event via a letter delivered on Tuesday 9 May 2023. A total of 783 letters were delivered across a distribution area that had been carefully selected to target those who would be most interested in the proposals, namely those who live or operate closest to the Site. The leaflet distribution area can be found at Figure 5 below:

Figure 5: Leaflet Distribution Area shown in red



- 4.17 A public consultation event was undertaken on Wednesday 17 May 2023 at the Nutfield Memorial Hall. The well attended event provided the local community with an opportunity to review the proposals in person and engage with members of the project team from the various technical disciplines. The event was held between 4pm - 8pm. The venue was specifically chosen due to its location to the Site and the local community, accommodating easy access and encouraging stakeholders to engage.

- 4.18 In total 125 stakeholders attended the exhibition. Overall, the majority of attendees expressed a level of support in principle for the revised and scaled back proposals clearly responding to issues previously raised with the previous refused scheme. Matters regarding access, traffic volume, footpath and landscape preservation and the protection of the Green Belt were raised by the public.
- 4.19 Feedback forms were provided at the consultation event, as well as online via the Nutfield Green Park website, where a total of 29 forms were completed responding to questions relating to the preference of amenities in Nutfield; the importance of affordable housing; retainment of woodland, footpaths, open spaces; ecology and biodiversity; and highways improvements. The public's responses are summarised within the Statement of Community Involvement (SCI) prepared by Lexington, which is submitted alongside the planning application and provides further details of the public engagement strategy, process, and outputs of the events.
- 4.20 Following the exhibition, the website (www.FutureofTandridge.co.uk) was updated in June 2023 to set out responses to key comments raised during the public consultation event with a brief response from the project team addressing the feedback. In total, 1,536 people have visited the website since the update was launched.
- 4.21 Lexington will update the website on the submission of this outline planning application. The website will be updated periodically during the determination of the application, to promote the messaging of information sharing with the community.

5.0 PROPOSED DEVELOPMENT

- 5.1 The Site extends to approx. 58.8ha. Only approx. 7ha of the total site area will be subject to built development or hardstanding. This accounts for only approx. 12% of the total site area.
- 5.2 The remaining 52ha of the Site is proposed to be open space, of which approx. 2ha will be open space in and around the developable areas, with general open space making up the remaining 50ha of the Site.
- 5.3 The proposed development of only 12% of the Site is concentrated to the south close to the existing village of Nutfield to provide high-quality residential homes, retirement homes, extra care homes, flexible ancillary floorspace in use class E(e) and/or F2. High quality environmental and ecological enhancements to the existing open space, woodland and waterbodies are also proposed. Existing footpaths and cycle routes are to be retained and upgraded in some instances, as well as new pedestrian and cycle links improving the accessibility within the Site for future residents and connectivity with the existing Nutfield community.

- 5.4 The proposal seeks planning permission for:

“Outline planning permission for the development of the site for new homes (Use Class C3) and Integrated Retirement Community (Use Classes C2, E(e), F2), creation of new access, landscaping and associated works to facilitate the development, in phases which are severable (Outline with all matters reserved, except for Access).”

- 5.5 A summary of the key characteristics of the proposed development is provided below:

Quantum of housing

- a) Up to 166 residential units inclusive of market and affordable homes and self-build plots (Class C3);
- b) Up to 70 care home beds (Class C2);
- c) Up to 41 extra care facility beds;
- d) Up to 1,500 sqm Class E(e)², F2³ flexible use floorspace, including health care and community floorspace;

Scale and Height

- e) Residential height: up to 2.5 storeys (2 storeys plus accommodation in the roof);
- f) Proposed care home height: up to 2.5 storeys (2 storeys plus accommodation in the roof);
- g) Built area and massing is focused towards the southern part of the Site, towards Nutfield. The development parcels and associated infrastructure features have been located sensitively to minimise impacts;

² Use Class E(e) - Commercial, business and service - use, or part use: “(e) for the provision of medical or health services, principally to visiting members of the public, except the use of premises attached to the residence of the consultant or practitioner.”

³ Use Class F2 - Local Community - use as (a) a shop mostly selling essential goods of no more than 280sqm and where there is no such facility within 1,000m radius of the shop’s location, (b) a hall or meeting place for the principal use of the local community.

Design and Layout

- h) Mix of 1, 2 3, 4 and 5 bedrooms for the residential units;
- i) The residential units will seek to achieve multi or dual aspect properties;
- j) The residential units will comply with the Government's Technical housing standards - nationally described space standard;
- k) The care home and extra care facility beds to comply with relevant standards, which will be outlined further at the detailed design Reserved Matters Application stage;

Amenity and Landscaping

- l) Residential and care home communal amenity space will be provided, the precise area of which will be determined at reserved matters stage.
- m) Providing new high-quality accessible open space for users of recreational routes within the site;
- n) Landscape enhancements are principally proposed in the "undeveloped" part of the site to the north, including new woodland planting, enhancements to existing boundary vegetation, sustainable drainage features to increase biodiversity and visual amenity;

Parking and Servicing

- o) Car parking will be compliant with the Council's car parking guidance⁴:
 - a. C3 Residential (Suburban edge, Village and Rural):
 - 1 and 2 bed flats = 1 space per unit
 - 1 and 2 bed houses = 1.5+ spaces per unit
 - 3 bed houses = 2+ spaces per unit
 - 4+ bed houses = 2+ spaces per unit
 - b. C2 Residential institutions: Care home and Nursing home:
 - 1 car space per 2 residents OR individual assessment / justification
- p) EV parking space will be provided as follows:
 - c. Residential: 1 fast charge socket per residential dwelling (up to 166)
 - d. Care home: 50% parking spaces with fast charge socket
 - e. Visitor parking spaces: 50% provided with charge points
- q) Cycle parking will be provided in accordance with the Council's cycle parking guidance⁵

⁴ Tandridge Parking Standards Supplementary Planning Document (2012)

f. Class C3:

- Flats / houses without garages or gardens: 1 and 2 bedroom unit = 1 space
- Flats / houses without garages or gardens: 3 or more bedroom unit = 2 spaces

g. Class C2 Residential institutions: Care home and Nursing home = individual assessment

Access

- r) A new vehicular access junction onto the A25 including pedestrian/cycle facilities is via the A25;
- s) An internal access drive is proposed through the southern area of the Site via the A25 to provide access to the residential parcels, through the central woodland, connecting to the Integrated Retirement Community (defined in Section 7) parcel south-east of the Site.
- t) The alignment of the access drive is presented in the Movement & Access parameter plans and Masterplan.
- u) No vehicular access via Church Hill; and
- v) A new Toucan crossing on A25 to provide access to south side bus stop and Nutfield village.

6.0 PLANNING POLICY

- 6.1 Section 70(2) of the Town and Country Planning Act 1990 requires the decision maker to have regard to the provisions of the development plan, so far as material to the planning application, any local financial considerations, so far as material to the application and any other material considerations. Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that the determination of any planning application shall be in accordance with the development plan (taken as a whole)⁶ unless material considerations indicate otherwise.

Adopted Policy

- 6.2 The adopted development plan for Tandridge District Council comprises:
- a) Tandridge District Core Strategy (October 2008);
 - b) Local Plan Part 2: Detailed Policies 2014-2029 (July 2014); and
 - c) Tandridge District Planning Policy Map (2018).
- 6.3 Relevant adopted Core Strategy and Local Plan Part 2 Policies relating to the proposed development and the Site are summarised in Appendix 4 below:

Material Considerations

- 6.4 Other material planning policy and guidance which are relevant to this application are set out below:
- a) National Planning Policy Framework (2023) (“NPPF”);
 - b) National Planning Practice Guidance (2019) (“PPG”);
 - c) Tandridge Parking Standards Supplementary Planning Document (2012);
 - d) Our Local Plan Trees and Soft Landscaping Supplementary Planning Document (2017); and
 - e) Draft ‘Our Local Plan: 2033’; (Regulation 22 Submission, 2019) (see paragraphs 6.16 - 6.21 below).

National Planning Policy Framework (2023)

- 6.5 Chapter 2 “*Achieving sustainable development*” of the NPPF clearly sets out its objectives to deliver sustainable development responding to three overarching objectives:
- a) Economic: help build a strong, responsive and competitive economy.
 - b) Social: support strong, vibrant and healthy communities, ensuring a sufficient number and range of homes can be provided to meet the needs of present and future generations.
 - c) Environmental: protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution and mitigating and adapting to climate change.

⁶ S.38(3)(b) Planning and Compulsory Purchase Act 2004

- 6.6 To achieve this, paragraph 11 states that a presumption in favour of sustainable development should be applied. In terms of decision-making this means:

“...11(c) Approving development proposals that accord with an up-to-date development plan without delay;

- 6.7 Where this is not the case, paragraph 11(d) of the NPPF is then engaged which states that where the policies which are most important to determining an application are out-of-date⁷, permission should be granted unless;

“...i) the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed⁸;

ii) or any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.”

- 6.8 Chapter 5 entitled “*Delivering a sufficient supply of homes*” supports the Government’s overarching objective to significantly boost the supply of homes. Among other things, Chapter 5 of the NPPF states it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed, and that land with permission is developed without unnecessary delay.
- 6.9 Chapter 5 also highlights the requirement for Local Planning Authorities to maintain a 5-year housing land supply of deliverable sites, with an appropriate buffer (as set out in paragraph 74) and to monitor progress on the Housing Delivery Test, which should not fall below 95%.
- 6.10 Chapter 13 “*Protecting Green Belt Land*” sets out the five purposes of the Green Belt which are:
- a) To check the unrestricted sprawl of large built-up areas;
 - b) To prevent neighbouring towns merging into one another;
 - c) To assist in safeguarding the countryside from encroachment;
 - d) To preserve the setting and special character of historic towns; and
 - e) To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.
- 6.11 Paragraph 145 states local planning authorities should plan positively to enhance the beneficial use of Green Belts, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land.
- 6.12 Paragraph 147 states that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. Development in the Green Belt is regarded by definition as inappropriate unless it falls within the exceptions listed in paragraphs 149 and 150 of the NPPF.

⁷ NPPF, para 11(d) footnote 8

⁸ NPPF, para 11(d) footnote 7 - reference to Green Belt policies in the Framework (paras 147 and 148)

- 6.13 Paragraph 148 states that 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.
- 6.14 Chapter 15, “*Conserving and enhancing the natural environment*”, at paragraph 174 requires decisions to contribute to and enhance the natural and local environment by minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures.

Local Plan Part 2 (2014): Detailed Policies 2014-2029

- 6.15 The 2014 Local Plan, whilst substantially out of date, remains the statutory development plan for Tandridge. Of particular importance and relevance to the determination of the proposed development are policies DP1 - Sustainable Development and DP10 - Green Belt:

DP1: Sustainable Development

A. When considering development proposals the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. It will always work proactively with applicants jointly to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area.

B. Planning applications that accord with the policies in this Local Plan (and, where relevant, with policies in neighbourhood plans) will be approved without delay, unless material considerations indicate otherwise.

C. Where there are no policies relevant to the application or relevant policies are out of date at the time of making the decision then permission will be granted unless material considerations indicate otherwise - taking into account whether:

- 1. Any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole; or*
- 2. Specific policies in that Framework indicate that development should be restricted.*

DP10: Green Belt

A. The extent of the Green Belt is shown on the Policies Map. Only in exceptional circumstances will the Green Belt boundaries be altered and this would be through a review of the Core Strategy and/or through a Site Allocations Development Plan Document.

B. Within the Green Belt, planning permission for any inappropriate development which is, by definition, harmful to the Green Belt, will normally be refused. Proposals involving inappropriate development in the Green Belt will only be permitted where very special circumstances exist, to the extent that other considerations clearly outweigh any potential harm to the Green Belt by reason of inappropriateness and any other harm.

Draft Local Plan

- 6.16 The draft *Tandridge Local Plan: 2033* was submitted to the Planning Inspectorate for examination in January 2019. Public hearings sessions were held between October to November 2019 and have now closed.
- 6.17 Over recent months, there has been various correspondence between the Inspector and the Council. A letter from the Inspector to the Council dated 23 June 2023 reiterated concerns, for example, over delays, the out of date evidence base, the need for technical assessment of highway junctions etc such that there the route to soundness for the draft Local Plan posed significant challenges. Subsequently, a procedural meeting was held on 27 July 2023 at which the Council presented the position on how the examination could progress, with the proposed removal of South Godstone Garden Village allocation, new staff resourcing and timescales for the further work ahead of the adoption of a scaled-back new Local Plan.
- 6.18 The Inspector has subsequently issued a letter to the Council dated 10 August 2023. Following a three year protracted examination process, the Inspector has acknowledged a number of procedural challenges in progressing the Plan as proposed by the Council, such that the Inspector considers it is not possible to make the draft Plan sound by proposing main modifications to it. The Inspector has therefore indicated that he will recommend that the draft Plan is unsound and that it is not adopted. Alternatively, the Inspector has suggested that the Council may wish to withdraw the Local Plan before his recommendation is confirmed within the Inspector's Examination Report.
- 6.19 A Planning Policy Committee Meeting is to be held on 21 September 2023 to discuss the decision to withdraw the draft Local Plan. Members voted unanimously to request the Local Plan Inspector prepares his Report to conclude the unsoundness of the draft Local Plan. The recommendation of the Policy Committee will now be reported to Full Council 19 October 2023 for ratification before confirming to the Inspector.
- 6.20 Until the position on the draft Plan is formalised this Planning Statement has included reference where necessary and appropriate to the emerging draft Local Plan policies, but in the circumstances, very limited weight should now be attributed to them. Once the Local Plan has been found unsound / withdrawn, the draft policies referenced will no longer be relevant and should properly carry no weight in the determination process.
- 6.21 The draft Local Plan key relevant policies are listed below and considered within the "Planning Assessment" section in the context of the above commentary / status:
- a) Policy TLP01 "Spatial Strategy"
 - b) Policy TLP02 "Presumption in favour of Sustainable Development"
 - c) Policy TLP03 "Green Belt"

- d) Policy TLP10 “Responsive Housing Strategy”
- e) Policy TLP12 “Affordable Housing Requirement”
- f) Policy TLP14 “Specialist Need Housing and Extra Care”
- g) Policy TLP17 “Health and Wellbeing”
- h) Policy TLP18 “Placemaking and Design”
- i) Policy TLP19 “Housing Densities and the Best Use of Land”
- j) Policy TLP32 “Landscape Character”
- k) Policy TLP35 “Biodiversity, Ecology and Habitats”
- l) Policy TLP37 “Trees and Soft Landscaping”
- m) Policy TLP45 “Energy Efficient and Lower Carbon Development”
- n) Policy TLP47 “Sustainable Urban Drainage and Reducing Flood Risk”
- o) Policy TLP50 “Sustainable Transport and Travel”

7.0 PLANNING ASSESSMENT

- 7.1 This section provides a comprehensive assessment of the planning merits of the proposed development considered against the planning policy context outlined in Section 6 above. These policies inform the following planning considerations, with reference made to the findings and conclusions of technical reports submitted to provide an assessment that will inform the overall planning balance and the determination of the outline planning application.

Decision-Making Approach

- 7.2 In accordance with Section 38(6) of the Planning and Compulsory Purchase Act (2004), the Development Plan, when taken as a whole (s.38[3][b]), is the starting point for the determination of planning applications. The determination is required to be in accordance with the Development Plan unless material considerations indicate otherwise.
- 7.3 The Tandridge Local Plan (2014) is now substantially out of date, albeit it is still extant, and has not been superseded by a replacement development plan. Policies in the 2014 Local Plan should therefore be considered in the determination of development proposals in accordance with the first limb of the Section 38(6) test. Policy DP1 reflects the 2012 Framework's presumption in favour of sustainable development and the delivery of economic, social and environmental benefits to an area (NPPF, para 11).
- 7.4 Policy DP1(C) goes on to state that where *"relevant policies are out of date at the time of making the decision then permission will be granted unless material considerations indicate otherwise."* Consequently, Policy DP1(C)(1) requires the decision maker to firstly consider whether the relevant policies are out of date and, if so, to consider, secondly, either whether the adverse impacts of the proposals significantly and demonstrably outweigh the benefits or specific policies in the Framework indicate development should be restricted.
- 7.5 The relevant policies in the 2014 Local Plan are patently out of date. It is therefore necessary to consider whether there are specific policies in the Framework which indicate development should be restricted. In the present case, these policies are the green belt policies in the Framework.
- 7.6 Applying paragraph 147 of the Framework, as none of the Green Belt development exceptions in paragraph 149 and 150 of the Framework apply, the proposed development would constitute 'inappropriate development' which is harmful to the Green Belt and should not be approved except in very special circumstances. Paragraph 148 of the Framework requires substantial weight to be given to any identified harm to the Green Belt, whether definitional (i.e. by reason of the proposal being inappropriate development) and/or actual (e.g. in respect of spatial and visual harm to openness).
- 7.7 In order for the proposed development to accord with the development plan overall, applying the most important and relevant development plan policies, namely policies DP1(c) (which gives the presumption in favour of sustainable development plan status) and DP10 (which gives the key Framework green belt test development plan status), it is necessary for the benefits of the development proposals to clearly outweigh the harms to the Green Belt by reason of inappropriateness and any other harm. The outcome of this exercise will determine both whether the proposals comply with the development plan overall (the s.38(6) test) and whether they satisfy the test in paragraph 147 of the Framework.

- 7.8 The commentary that follows in the remainder of this section sets out the planning assessment of the various components of the proposed development scheme and the relative weight to be attached to the harms and benefits of the scheme. This then feeds into the overall planning balance section of the Planning Statement which clearly demonstrates that planning permission should be granted.

Principle of Development

- 7.9 The Site is in the Green Belt and (as none of the exceptions in paragraph 149 and 150 of the Framework apply) would constitute by definition ‘inappropriate development’, as defined by paragraph 148 of the NPPF.
- 7.10 As outlined by paragraph 148 of the Framework, any harm to the Green Belt must be given substantial weight. Therefore, in order for the proposed development to be considered acceptable the benefits of the development must clearly outweigh the harms of the proposal.
- 7.11 As concluded in this statement, the overall development of this site, comprising both private and affordable residential and care development alongside extensive open space and woodland parcels, with a substantial enhancement in biodiversity, presents a combination of benefits (*‘other considerations’*) that individually and collectively weigh very heavily in favour of the proposals. It will be demonstrated that these benefits clearly outweigh the definitional Green Belt harm and limited actual harm to the openness and purposes of Green Belt, such that planning permission for the proposed development should be granted.
- 7.12 In reaching such a view on the acceptability of the principle of development, the Site’s location within the Green Belt is taken into account and the main matters for consideration are as follows:
- (a) The effect of the proposal on the character and appearance of the area;
 - (b) The effect of the proposal on the openness of the Green Belt;
 - (c) Whether the Site is accessibly located with regards to local services and facilities; and
 - (d) Whether any harm associated with the development of the Site is clearly outweighed by other considerations.
- 7.13 In terms of the Site’s effect on the **character and appearance of the area (a)**, and on the openness of the Green Belt (b), these matters are addressed by the Landscape and Visual Appraisal and Green Belt Assessment prepared by FPCR which is submitted in support of this application.
- 7.14 The Site has been assessed against purposes A - D of the Green Belt, with the exception of Purpose E⁹ which is not applicable to the assessment of this Site, as outlined by the Landscape Visual Appraisal and Green Belt Assessment undertaken by FPCR. In summary, the conclusions of the assessment are as follows:

⁹ NPPF Paragraph 138 (e) “to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.”

- **Green Belt Purpose A (unrestricted sprawl)**, the Site lies away from large built up areas. Smaller built up areas at Nutfield and South Nutfield exist within or at the end of the parcel and these are separated by topography and woodland, maintain separate identities, and limiting the influence of built development. As built development within the scheme would be contained by existing woodland, it would have no effect on the purpose of checking the unrestricted sprawl of large built up areas.
- **Green Belt Purpose B (settlement merger)**, the proposed development lies to the north of Nutfield, with South Nutfield located to the south. This development will make no difference to the separation between Nutfield and South Nutfield which will be maintained. The development will have no effect on this Green Belt purpose.
- **Green Belt Purpose C (safeguarding the countryside)**, similar to the assessment of Green Belt Purpose B, more immediately to the proposed development, parcels OS4, OS7, OS10, OS12 and OS13 [of the Components Plan ref: PL07] create a further visual barrier to protect the visual openness and cascading topography from the north. The proposed development would only involve built development at very specific parcels of land, contained by existing woodland and settlement. The visual effects on the wider area would be very limited, and the existing character of wider countryside beyond the site boundaries would be minimally affected. Inevitably there would be a degree of encroachment on the land used for the development itself, but the perception of encroachment on any wider area would be negligible.
- In response to **Green Belt Purpose D**, the site is located away from the historic towns within its immediate setting and Nutfield. The scheme would therefore have no effect on this purpose.

7.15 The Landscape Visual Appraisal and Green Belt Assessment is summarised in further detail below. In short, the assessment concludes that adverse landscape and visual effects would be limited and very localised.

7.16 The Heritage Assessment, undertaken by Andrew Joseph Associates, further explores the relationship between the site and listed properties in the east:

*In terms of the effects of the proposals on the purposes of the Green Belt, the scheme would have a **no effect** on the purposes of checking the unrestricted sprawl of large built-up areas, and a very limited role in safeguarding the countryside from encroachment. The scheme would not lead to any merging of neighbouring towns, there would be no coalescence between Nutfield and South Nutfield, and the gap between the settlements would not be narrowed. The site does not meet the criterion of preserving the setting and special character of historic towns (FPCR, para 7.43)*

7.17 In relation to the effect of the **development on Green Belt openness (b)** the visual openness assessment undertaken by FPCR draws on the landscape and visual appraisal. This has demonstrated the limited extent from which the proposed development would be visible due to the surrounding built form and intervening vegetation. Generally, there are very few locations beyond the immediate context of the site where there would be any notable views of the proposals (ref: FPCR - Viewpoints in Figure 6 of the Landscape and Visual Appraisal and Green Belt Assessment).

- 7.18 From the north, views are limited by woodland that surrounds the site. Where there is a small gap in the woodland, a new earth landform is proposed and to be planted to continue containment and be rapidly assimilated.
- 7.19 There would be a very limited effect on visual openness for users of the A25 Nutfield Road to the south. Some additional built development would be apparent for a short distance west of the existing settlement. South of the A25 there would be little perception of the scheme.
- 7.20 Overall, FPCR conclude on Green Belt openness that the adverse effects on visual openness arising from the scheme would be very limited. The extensive areas of existing woodland to the north-east and west, and settlement mainly to the south provide visual containment and additional planting within and around the scheme which would further reduce any adverse effects on visual openness over time.
- 7.21 In terms of **spatial** openness, the scheme would involve the change of 58.8ha of low grade former landfill/mineral extraction land to development and green infrastructure. The developed part of the site only amounts to approximately 7 ha. The housing would be no more than two and a half storeys, at and a maximum height of 10.5 m to ridge within a small section of the site (see Parameter Plan PL05 - Building Heights Plan). The care village would be set lower than existing ground levels to a maximum height of 13m above the existing ground, as indicated on the parameters plans and visual wirelines (FPCR LVA, Figure 31-33), substantially limiting the spatial effect of the development on the Green Belt.
- 7.22 With regards to whether the site is in an **accessible location (c)**, the site is outside of, but adjacent to, the settlement boundary of Nutfield. The majority of the proposed development parcels are within 400m, or a 5-minute walk of an existing bus stops. The nearest bus stops to the site are located on Nutfield Road and Mid Street to the south of the site.
- 7.23 Furthermore, and as is addressed elsewhere within this statement, and within the application submission (Parameter Plan: Access and Movement, Transport Assessment, Design and Access Statement), reference is made to the various services and facilities within close proximity of the site which are accessible by foot or on a bicycle. This demonstrates that the site is highly accessible by a range of transport modes with further enhancements proposed as part of the package of highways improvement measures associated with the development.
- 7.24 Core Strategy policy CSP1 confirms there will be no village expansion by amending the boundaries of either the Larger Rural Settlements or Green Belt Settlements, which includes Nutfield.
- 7.25 Moreover, the proposed development proposes new services and facilities including health care and/or a convenience store uses (use Classes E(e) and F2) and meeting the needs of the wider TDC area through increased housing, care provision and enhancing publicly accessible open space. This will enhance the settlement status of Nutfield and further support the economic, social and general well-being of existing and future residents of the area. The proposed development is considered to create benefits at a local and wider TDC level.
- 7.26 With regards to addressing harm associated with the development of the Site this needs to be clearly **outweighed by other considerations (d)**. The following considerations are relevant in demonstrating that considerable benefits clearly exist to outweigh any harm to the Green Belt and any other harm:

Provision of Housing, including market, affordable and self-build homes

- 7.27 The proposed development will provide up to 166 new homes, comprising both private market sale and affordable tenures in the west and central areas of the Site with up to 41 later living (retirement) units (207 in total) with a care home of up to 70 beds, forming an Integrated Retirement Community (defined below) to the east of the site. The homes will comprise a range of 1 - 5 bedroom units, providing an appropriate mix of housing types and sizes to meet the needs of different households within the wider community. This allows residents to remain in the locality as their housing needs change and helps build a balanced and mixed community.
- 7.28 This approach is consistent with Chapter 5 of the NPPF which promotes the delivery of a sufficient supply and mix of new homes. Paragraph 60 of the Framework states the importance of a sufficient amount and variety of land coming forward where it is needed, in order to support the Government's objective of significantly boosting the supply of homes. Paragraph 74 of the Framework requires local authorities to demonstrate and maintain a five year housing land supply of deliverable sites (5YHLS).
- 7.29 This is further supported by TDC policies CSP2, CSP7 of Core Strategy and emerging policy TLP10, which are aligned with the NPPF's housing objectives.

Market Housing

- 7.30 Chapter 5 of the NPPF requires Local Planning Authorities to maintain a 5-year housing land supply and to monitor progress on the Housing Delivery Test, which should not fall below 95% (NPPF paragraph 76).
- 7.31 The proposed development would deliver a considerable number of new homes, in an area where there is a chronic shortfall in housing land supply (at just 1.57 years as accepted in the Council's own evidence¹⁰) and where there has been consistent under delivery of new homes.
- 7.32 The accompanying Five-Year Housing Land Supply (5YHLS) note, prepared by Emery Planning, considers that the deliverable supply is even less than that claimed by the Council. With reference to the definition of "deliverable" set out in the Annex to the Framework, this is because, in summary, the Council has not provided the necessary supporting evidence to justify the inclusion of major sites in the housing land supply without detailed planning permission, including the proposed allocations in the pending and soon to be confirmed by the Inspector as an unsound draft Local Plan. In any event, whether or not the Applicant or the Council's housing land supply position is adopted, the Council cannot, even by their own admission, demonstrate a 5YHLS by a very significant margin.
- 7.33 The Government's Housing Delivery Test (HDT) reinforces this position by clearly outlining the recent shortfall in housing delivery. The relevant data shows that TDC delivered just 38% of its housing need over the last 3 years. Table 2 below sets out the last three HDT figures, inclusive of the requirement and delivery of all three monitoring years.

¹⁰ Limpsfield Road, Warlingham (April 2023): Appeal ref: AAP/M3645/W/22/3309334 & AMR 2021

Table 2: Housing Delivery Test results

Measurement Year	Total Required	Total Delivery	Percentage	HDT Measure
2019 (16/17 - 18/19)	1,541	776	50%	Buffer
2020 (17/18 - 19/20)	1,706	849	50%	Presumption
2021 (18/19 - 20/21)	1,672	634	38%	Presumption

- 7.34 The table outlines the consistently very poor performance in the HDT, meeting only 50% of the Council's need, at best. The presumption in favour of sustainable development in paragraph 11(d) of the NPPF (has been applied to the Council for the last two years of monitoring, with delivery falling by a further 12% from 2020 to 2021.
- 7.35 The accumulated housing delivery shortfall from the HDT data in Tandridge is 2,660 new homes in the last three years of monitoring alone.
- 7.36 The poor performance evidenced at Table 2 of this Statement from the Housing Delivery Test measurements confirms the District is the 6th poorest performing out of the 321 local authorities nationally.
- 7.37 This demonstrates an acute deficiency and shortfall in the local housing supply and delivery. In the absence of any further forthcoming land for development by way of a planned strategy through the Local Plan process, this reinforces the need for this proposed development in the short term to contribute significantly to addressing the identified extremely serious housing land supply and housing delivery deficits.
- 7.38 The development of this Site, adjacent to the settlement boundary, represents an opportunity to deliver up to 166 new homes of all types, including self-build and accessible homes and private and affordable tenures.
- 7.39 The proposed quantum of development represents a deliverable and meaningful contribution towards meeting the very substantial shortfall and the future annual need for TDC in the short term without undermining the medium / longer term spatial strategy of the District as part of the plan making process of a new Local Plan in due course.
- 7.40 The delivery of a substantive quantum of housing to meet the severe and compounded housing supply shortfall on this available and deliverable site should therefore be afforded **very substantial weight** in favour of the determination of the application.

Affordable Housing

- 7.41 As a direct consequence of the identified substantial shortfall in housing delivery there is a significant shortage of affordable housing in Tandridge. Policy CSP4 sets a requirement of 34% affordable housing on sites of 10 or more homes within rural area. TDC have published three assessments (2008 Strategic Housing Market Assessment (SHMA) and 2015 and 2018 Affordable Housing Need Assessments (AHNA)) of affordable housing need over the course of the past 14 years since the start of the Core Strategy period in 2008, each of which demonstrates a severe lack of affordable housing delivery in Tandridge District. These are summarised in table 3 below.

Table 3: Summary of Housing Needs Assessments in Tandridge District

Document	Base date	End date	Annual affordable housing need
2008 SHMA	2008/09	2012/13	720 dwellings
2015 AHNA	2015/16	2019/20	456 dwellings
2018 AHNA	2018/19	2022/23	391 dwellings

- 7.42 Monitoring data shows the delivery of affordable housing in recent years has been significantly below the housing requirement of affordable homes per year. Further analysis is provided within the Affordable Housing Statement, prepared by Tetlow King, but in short when assessing any of the three targets as against the monitoring data, there are very significant shortfalls in each year:
- (a) The 2008 SHMA: A need for 720 affordable dwellings per annum between 2008/09 and 2012/13. A shortfall of -3,401 affordable dwellings has arisen in the five year period, equivalent to -680 per annum.
 - (b) The 2015 AHNA sets a need for 456 affordable dwellings per annum between 2015/16 and 2019/20. A shortfall of -1,922 affordable dwellings has arisen in the five year period, equivalent to -384 per annum.
 - (c) The 2018 AHNA is the most recent assessment of affordable housing need, requiring 391 affordable dwellings per annum between 2018/19 and 2021/22. A shortfall of -1,283 affordable dwellings has arisen in first four years of the 2018 AHNA period, equivalent to -321 per annum.
- 7.43 The Applicant will deliver above the adopted affordable housing policy requirement with an on-site provision up to 36% affordable homes across all C3 houses. The specific breakdown by tenure and mix of this provision will be a matter for the detailed design stage. However, the provision of social rent and shared ownership will be aligned with the breakdown of policy CSP4. This represents a provision of up to 74 affordable homes of the 207 new homes proposed on site with a proposed split of 75% affordable rented and 25% shared ownership. This level of provision reflects the Tandridge Housing Strategy 2019-2023 which supersedes the development plan in terms of tenure split. This would meet a considerable part of the current shortfall and future need.

- 7.44 At the time of this application submission, the Council's Housing officer has advised that the Council is not seeking First Homes at this stage, as there is an overwhelming need for affordable rented accommodation in Tandridge.
- 7.45 The ability of the development to contribute significantly to addressing the existing and very substantial shortfall in the delivery of affordable housing in the District, coupled with seeking to address severe affordability issues (as set out in the Affordable Housing Statement by Tetlow King) on site at levels above policy compliance for the provision of new homes (Class C3) should be separately afforded **very substantial weight** in the determination of the application scheme.

Self-Build and Custom Housing

- 7.46 At a national level, the Self Build and Custom Housebuilding Act (2015) placed a legal duty on Local Planning Authorities to keep a register of groups who want to acquire serviced plots. The Housing and Planning Act 2016 goes further, beyond the 2015 Act, to place a statutory duty on Local Planning Authorities to grant sufficient development permissions to meet the demand for self-build and custom housing. PPG guidance and NPPF paragraphs 62 and Annex 2 further details definitions and guidance of for provision of Self-Build and Custom Housing.
- 7.47 Locally, however, neither the Core Strategy (2008) nor the Local Plan (2014) contain any policies relating to the provision of self-build and custom housebuilding. The emerging New Local Plan sets out policy TLP10 that addresses the need for different types, sizes and tenures, proposals should take account of the Council's most up-to-date Housing Strategy.
- 7.48 Tetlow King has assessed available secondary data, which the accompanying Self-Build and Custom Housebuilding Needs Topic Paper indicates that as many as 1,421 people may be interested in building their own home in the foreseeable future. Over the Core Strategy Plan Period between 2006 and 2026 there would be an identified need for between 900 and 1,280 plots in Tandridge. It is clear from the data available that there is an unmet demand for self-build and custom build plots.
- 7.49 The Illustrative Masterplan includes the provision of 8 serviced plots for self-build and custom housebuilding, would address 22% of the shortfall that has accrued between 2016-2020. Such provision of self-build and custom housing should therefore be afforded **substantial weight** in the determination of the application scheme.
- 7.50 On the basis of the above, the delivery of a substantive number of new housing, including affordable, accessible and self-build units, will both individually and collectively provide very significant benefits weighing very heavily in favour of the application that clearly outweigh any harm to the Green Belt to justify development and can be robustly demonstrated (NPPF para. 148).
- 7.51 It is considered that the principle of housing development of the scale, quantum and composition proposed at this site is consistent with national and local planning policy and will provide an appropriate mix of housing types and sizes to meet local housing needs. The delivery of this site will also support the Government's overarching objective of significantly boosting the supply of homes and a sufficient amount and variety of land coming forward where it is needed (NPPF para. 60).

Provision of Care, including extra care and a care home

- 7.52 The Planning Practice Guidance confirms:

“The need to provide housing for older people is critical. People are living longer lives and the proportion of older people in the population is increasing. In mid-2016 there were 1.6 million people aged 85 and over; by mid-2041 this is projected to double to 3.2 million. Offering older people a better choice of accommodation to suit their changing needs can help them live independently for longer, feel more connected to their communities and help reduce costs to the social care and health systems. Therefore, an understanding of how the ageing population affects housing needs is something to be considered from the early stages of plan-making through to decision-taking.” (paragraph 001 Reference ID: 63-001-20190626)

- 7.53 The current provision of care home beds in Tandridge amounts to 978 beds, split as 325 for personal care and 653 for nursing care. There is a future need up to 2035 for a further 463 beds for personal care, with a reduction of 99 beds for nursing care over that same period. However, these figures are based solely on a quantitative assessment and have no regard for whether the current care home provision meets the modern requirements to deliver single occupancy rooms with en-suite provision.
- 7.54 TDC’s adopted policy CSP8 states that the Council will provide for the development of at least 162 units of Extra Care Housing in the period up to 2016 and additional units in the period 2017-2026 following an updated assessment of need.
- 7.55 Policy CSP8 continues and establishes the criteria for suitable sites including the following element to which regard will be had:

“The potential to co-locate a nursing/residential care home on the site where there is an acknowledged need.”

- 7.56 The policy therefore expressly recognises the benefits in co-locating extra care with nursing/residential care home beds.
- 7.57 As outlined by the Tetlow King note submitted in support of this application, by 2016 the only extra care scheme that had been delivered in the District was the Charters Village site at Dormansland, providing 83 units of extra care meaning a shortfall of 79 units.
- 7.58 The proposed development represents a deliverable site that can deliver up to 111 beds of care. The current Illustrative Masterplan shows this as an indicative provision as a 70 bed care home, with 41 extra care units at the eastern part of the site. A proportion of this care provision, including the extra care, is provided within the proposed Integrated Retirement Community (IRC), which is a collective term referring to bringing together the different types of specialist accommodation and facilities that are designed to support people in older age.
- 7.59 In the case of this proposed development, the IRC offers self-contained extra care unit with onsite staff care. The IRC will also provide ancillary facilities, offering flexible Class F2 and Class E) use floorspace, to further support the provision of other facilities for the benefits of the residents of the IRC and the wider community of Nutfield.
- 7.60 The exact quantum and mix of care provision proposed will be a matter for the detailed design stage. Similarly, the exact composition of the ancillary and complementary facilities at the IRC will also be explored at the detailed design stage.

- 7.61 Within the ancillary IRC uses and the proposed Class E(e) and F2 floorspace, the Applicant is also keen to provide facilities that meet specific health requirements of future residents, care providers and to be used by those within the existing local community. The proposed floorspace would be able to accommodate, for example, several medical consulting rooms for visiting practitioners, including but not limited to, a GP surgery, pharmacy, dentist, physiotherapists, MRI screening, health and well-being consultations rooms and mobile screening to target a specific local need.
- 7.62 Overall, it will be seen from the above analysis that there is an acute identified need for the provision of later living and nursing care beds within the District that this development can also directly contribute towards. The proposed care provision and ancillary IRC uses should therefore be afforded **very substantial weight** in the determination of the application.

Design Approach

- 7.63 The proposed development will provide up to 166 new homes which will make a meaningful contribution towards meeting the unmet housing needs of the area for market and affordable housing. The proposed development will provide a variety of types and sizes of homes to deliver a balanced and mixed community that will fully align with Core Strategy policy CSP7, the SHMA (2018), and the Housing Strategy (2019).
- 7.64 The housing layout will be designed to encourage residents to engage with their neighbourhood, with houses fronting the road and overlooking green areas. The aim is to encourage a sense of community and a safe environment for all members and ages of the community. Adam Architecture have set out the initial assessment of the local area and have defined proposed character areas to communicate the broad design principles for each part of the proposed development. All 12 character areas are noted in Figure 6, which forms part of the overall design community integration and approach to the creation of the Illustrative Masterplan. These areas are detailed at Section 3 of the DAS.

Figure 6: Illustration of Character Areas



- 7.65 In the interests of providing socially integrated communities, the proposed design allows for affordable housing to be clustered in small groups interspersed with the market housing. The affordable housing will be designed to the same external specification and will be visually indistinguishable from the market housing.
- 7.66 The IRC, in the eastern parcel, follows a similar design approach to the housing within the western and central part of the site. The IRC will further assist with the delivery of a cohesive community, with direct pedestrian and cycle links to the existing Nutfield village and the proposed link to the east towards the church, which will be subject to detailed design. This will enhance the social sustainability of the overall development. Ease of connectivity between the IRC and future residents of the site and the village has been paramount in the evolution of the Illustrative Masterplan.
- 7.67 The pattern and layout of development has further considered the rationale towards illustrative density to ensure that the existing local characteristics are reflected through into this Illustrative Masterplan. As currently shown within the Illustrative Masterplan, the parcels towards the outer edges of the built development parcels are proposed to be designed and laid out at a reduced density to provide a rural edge condition and transition to the open areas of the site beyond. One such area on the edge of the western development zone (character areas 4 and 5 (see Figure 6 above)) is earmarked to incorporate the self-build and custom plots at a lower density. This responds directly to the requirements of policy CSP18 and CSP19. The design coding and materials parameters for these plots will be a matter for the detailed design stage.
- 7.68 Beyond the proposed build development, the design and layout purposefully seeks to create and preserve clear and defensible boundaries between the edge of the site and the adjacent Green Belt. The early considerations to the character areas of the proposed development and the design layout rationale are all outlined in greater detail within the Design and Access Statement and the Landscape and Visual Appraisal and Green Belt Assessment.

Ground Conditions

- 7.69 MJCA have led the site investigation across the western and eastern parcels together with the proposed area for the link road. The pollution control officer at TDC has been consulted on the scope of the site work prior to the 2023 site investigation. The Environmental Protection Group Limited (EPG) were commissioned on behalf of TDC to review and comment on the investigation proposals. Both TDC and EPG have reviewed the accompanying report prior to the submission of this application.
- 7.70 The site investigations have not identified any significant contamination in the area of proposed residential and commercial development which it is considered cannot be remediated as part of the development. As is the accepted practice for developing sites with historical industrial uses further site investigation work will be carried out pursuant to suitably worded planning conditions and a remediation strategy, to the extent that it is necessary, would be put in place to achieve ground conditions and a development which is deliverable and protective of human health and the environment in accordance with appropriate standards. This has been supported by both TDC and EPG, with EPG's Letter (Appendix 3) noting:

“Overall EPG are satisfied that suitable exploratory investigations and preliminary assessments have been completed and that the risks can be appropriately mitigated via planning conditions.”

- 7.71 The full feedback letter from EPG is enclosed at Appendix 3 of this Planning Statement.
- 7.72 Subject to further detailed investigations to be undertaken at a detailed design stage and secured by condition, the development proposals and layout of the residential parcels is not anticipated to cause any harm in regard to ground conditions on site and for future living conditions, subject to expected standard mitigation measures to be provided at Reserved Matters Application stage.

Transport, Access & Parking

- 7.73 Vectos (part of SLR) have led on highway matters and engaged in pre-application discussions with Surrey County Council (SCC) to discuss the detailed elements of the proposed scheme relating to accessibility as set out in Section 4 of this Statement. The Transport Assessment and Framework Travel Plan accompany this application.

Access

- 7.74 The main and new vehicular access to the site will be via the A25, Nutfield Road, located to the west of Nutfield village and is applied for in full as part of this Outline Application. The vehicular access will connect directly to the western parcel, which subsequently connects via the proposed ‘Drive’ to the central and eastern parcels of the site where further residential development and the IRC is proposed to be located, as outlined on the Access and Movements Parameter Plan.
- 7.75 As set out in the supporting Transport Assessment, the proposed access junction will accommodate large waste collection vehicles and emergency vehicles and will comprise a 3.0m shared footway/cycleway along the site frontage, a raised ‘Copenhagen’ style crossing for pedestrians and cyclists, and extension of the 30mph speed limit. The 30mph speed limit will be moved west and a gateway feature to be agreed with SCC introduced.
- 7.76 This gateway feature will be similar to the measures seen on approach to the village from the east and could include painted speed roundels on the carriageway, white picket-fencing features on both sides of the road, ‘Welcome to Nutfield’ signage, and/or localised road narrowing. These features have been discussed with SCC through pre-application discussions and SCC are happy with this approach. The exact form of the gateway feature will be agreed with SCC in due course.
- 7.77 A detailed access plan is submitted for approval as part of this outline application (Drawing Title: Copenhagen Crossing Style Junction; Drawing No: SK-CH-005), demonstrating successful tracking for refuse and fire vehicles.
- 7.78 Following a couple of pre-application meetings with SCC the access design has been agreed in principle, as outlined in the accompanying Transport Assessment.

Traffic Impact

- 7.79 Modelling of key local junctions has been undertaken along the road network utilising 2022 traffic surveys. One committed development has been identified as a major scheme with associated traffic routing through the study area (ref: 16/01066/F). The junction for modelling were discussed and agreed with SCC at pre-application stage.
- 7.80 The modelling results show that in the ‘base + committed development’ scenario the A25/Park Works Road/Mid Street junction and A25/Church Hill/Coopers Hill Road junction operate at near design capacity in the AM and PM peak hours. This is due to delay for vehicles waiting to turn out of minor roads (i.e. Park Works Road, Mid Street, Church Hill and Coopers Hill Road) onto the major road (i.e. the A25). Whilst the addition of proposed development traffic increases both of these junctions to capacity, the development traffic itself only increases queue lengths on these minor arms by a maximum of 1 vehicle per arm.
- 7.81 The proposed development itself is therefore not the result of these two junctions reaching their theoretical capacity. The performance issues shown are the result of background traffic growth along the A25. As such, the proposed development does not propose mitigation measures at these locations. This is consistent with Local Plan policy DP5.
- 7.82 There is not anticipated to be any material impact on the local road network as a result of this proposed development. Where any harm is identified, the sustainable transport measures outlined by the Transport Assessment and outlined below, will outweigh this harm. This is consistent with paragraph 111 of the NPPF, which states that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.

Sustainable Transport Measures

- 7.83 The proposals include the use of the existing network of footways and proposed cycle routes within the site. This will facilitate access between development parcels and also access to the A25 and to the National Cycle Network (NCN 21) at Chilmead Lane to the north.
- 7.84 In terms of connectivity off-site, the pedestrian/cycle routes link to the A25 where there are existing bus stops. The Applicant is committed to fund upgrades to the bus stops such as vegetation clearance, shelter improvements and Real Time Information boards.
- 7.85 A new signalised toucan crossing is proposed that will assist pedestrian safety crossing the A25. This improvement to existing infrastructure is consistent with policy CSP12 and will make it safer and more convenient for both new and existing residents to access the westbound bus stops as well as South Nutfield, including the existing Nutfield Primary School.
- 7.86 The Framework Travel Plan further includes opportunities for future residents to use the on-site facilities, cycle to Redhill which is a major service centre as well as rail station and use the existing bus services to access Redhill, Godstone, Gatwick Airport and Crawley.

- 7.87 In terms of Surrey's LTP 4 policy objectives (as set out in the Transport Assessment), the site will provide parking in accordance with current standards and appropriate EV charging facilities. Consideration to the quantum of cycle and car parking provision will be a matter for determination at the detailed design stage. Strong encouragement to use sustainable modes will be provided/secured through detailed design and Travel Plan.
- 7.88 The Transport Assessment clearly outlines how the traffic flows created by the proposed development will be accommodated within the local highway network, as required by NPPF paragraph 104. The Transport Assessment further outlines the utilisation of existing PROW and the enhancement to create cycle and pedestrian links throughout the site. This will improve permeability through the site and into the existing community.
- 7.89 The approach to highways has been informed by pre-application engagement with SCC and is in accordance with national and local planning policy, including NPPF paragraphs 39 - 42. The discussion with SCC on such matters are further outlined within Appendix C of the Transport Assessment.
- 7.90 At this outline stage, the proposed development is not anticipated to cause any detriment to the local highway network or from a transport sustainability perspective. As confirmed by the Transport Assessment, the proposed development addresses the locational sustainability of the site as set out within the reasons for refusal for the previous scheme. The proposed development will maximise the connections to the existing walking and cycling networks and key local amenities in the area to create greater permeability and connectivity. This connectivity further promotes use of sustainable transport routes, including the local bus services, present along the A25.
- 7.91 In line with paragraph 111 of the Framework, due to the lack of highway safety issues; the modest increase in traffic as a result of the development; and the safety enhancements that would be introduced through the scheme, the proposals will not have any unacceptable let alone severe residual cumulative impacts on the road network and/or highway safety. The proposed development further promotes the use of non-vehicular modes of transport, with pedestrian and cycle routes through the site and connectivity to existing bus services along the A25, and therefore accords with paragraph 112 of the Framework.

Ecology & Biodiversity

- 7.92 A suite of ecological surveys have been undertaken by FPCR to inform this proposed development. This is summarised by the Ecological Impact Assessment (EclA) and includes an UKHab Survey, a desktop study and a range of protected/notable species surveys. All reports are submitted in support of this application and not repeated here.
- 7.93 The site is dominated by a range of habitats including woodlands, grasslands, scrub and ponds. These are largely common and widespread habitats supporting limited botanical diversity, however the Lowland Mixed Deciduous Woodlands and the Hedgerows onsite are habitats of principle importance. The protection and enhancement of such existing habitats is embedded in local and national planning policy, namely Local Plan policy DP19 and DP9.
- 7.94 The Applicant's personal aspirations and design of the proposed development provides an existing and unique opportunity to boost the biodiversity of the site compared with the historic industrial use of the site. The surveys identify a number of species that are located on site and it is the applicant's strong desire to protect and enhance this abundant biodiversity.

- 7.95 The EclA demonstrated that through a combination of intrinsic mitigation, targeted mitigation, compensation measures, and ecological enhancement, which are detailed in the assessment, the proposals will lead to short-term and 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, importantly, in the medium- to long-term, negligible to no significant positive effects are anticipated for all important ecological features.
- 7.96 FPCR have also completed a Biodiversity Net Gain (BNG) Assessment. This BNG assessment details the use of the Natural England metric 4.0 to quantify the predicted net-change in biodiversity value of the site, before and after the proposed development.
- 7.97 Table 4 provides a summary of the headline results of the biodiversity metric. The full metric has been provided in Appendix A of the BNG Assessment by FPCR.

Table 4: Biodiversity Metric 4.0 Headline Results

Baseline	Habitat Units	433.32
	Hedgerow Units	12.01
	Watercourse Units	0.75
Post-Intervention	Habitat Units	527.44
	Hedgerow Units	20.76
	Watercourse Units	5.61
Total Net Unit Change	Habitat Units	+94.13
	Hedgerow Units	+8.75
	Watercourse Units	+4.86
Total Net Percentage Change	Habitat Units	+21.72%
	Hedgerow Units	+72.92%
	Watercourse Units	+648.14%

- 7.98 The accompanying metric demonstrates that a gain in excess of the minimum 10% can be achieved for habitats, hedgerow and watercourse units.
- 7.99 As the detailed design progresses, the above assumptions can be secured through an appropriately worded condition requiring the detailed design to be accompanied by a Habitat Management and Monitoring Plan.

7.100 In accordance with the biodiversity enhancement objectives set out in paragraph 174 and 180(d) of the Framework, but recognising the absence of an adopted local plan biodiversity policy ahead of the Environment Act coming into force (January 2024¹¹) and noting the recent agreement by the Planning Policy Committee on 21 September 2023 to the introduction of a minimum of 10% BNG on applications in the District, the ecological re-assessment, proposed protection measures and site wide enhancement, resulting in significant biodiversity net gain (+21.72%) generated by the proposed development, is considered to carry **significant weight** in favour of the proposals in the planning balance.

Arboriculture

- 7.101 The proposals are considered to meet the aims and objectives of local and national policy through careful consideration of the design and retention of a high proportion of the existing tree cover. The retention of existing trees coupled with targeted future management and enhancement of the existing and future tree cover will meet many of the individual aspirations set out in Local Plan and Core Strategy policies.
- 7.102 The design process has been led by a re-assessment of the existing site assets including landscape characteristics, landform, trees and woodlands, and the site ecology. Important individual trees will be retained and protected, and groups and woodlands will be impacted minimally as a result of a robust constraints led approach which is supported by a comprehensive set of staged site surveys and studies. This approach is consistent with policy CSP18.
- 7.103 A significant number of the trees, groups, and woodlands on site are being retained and protected due to their contribution to nature conservation and biodiversity, as required by Local Plan policy DP7. All the existing woodland areas on site will be managed and improved as part of the proposals enhancing the habitats already present. This is further detailed in the ecology reports.
- 7.104 All tree removals are internal to the site with the site boundary tree cover being maintained and managed to improve biodiversity and to soft the visual impact of the development. No significant adverse effects to public amenity are anticipated as a result of the proposals and tree removals.
- 7.105 The Arboricultural Assessment, submitted in support of the planning application, finds the overall proportion of loss to be low in comparison to the amount of high and moderate quality trees being retained. The development also provides a meaningful opportunity, to improve and manage the existing tree cover in the local area through appropriately applied work without the loss of any arboriculturally significant trees.
- 7.106 Figures 7 and 8 show aerial sketches (for illustrative purposes as presented at the public exhibition) from the north and illustrate how the proposed development has been created to respect retained tree and the root protection areas (RPAs).

¹¹ <https://www.gov.uk/government/news/biodiversity-net-gain-moves-step-closer-with-timetable-set-out>

Figure 7: Existing Aerial Sketch



Figure 8: Proposed Aerial Sketch



- 7.107 In subsequent Reserved Matters applications, following the final layout of the scheme, further assessment of the distance of the proposed development in relation to the calculated root protection area of retained trees will inform the layout of specific development parcels relevant to that detailed application.
- 7.108 The assessment concludes that at this outline stage the proposals are considered to be arboriculturally acceptable, in the absence of any harm associated with the proposed development.

Landscape & Visual Impact

- 7.109 The site is not subject to any national, local or other landscape designations. A Landscape Visual Appraisal has been undertaken by FCPR for the site, together with a Green Belt Assessment. This explores the nature of the existing visual amenity of the area and to establish the approximate visibility of the site / development from surrounding locations and receptors. A series of photo viewpoints have been selected and are enclosed within the Appraisal to support this analysis.
- 7.110 The assessment confirms that the visual receptors for the proposed development include residents within close proximity to the site, users of the local highway network, users of PROW (including within the site itself) and visitors to local historic assets and recreational areas. Visual receptors likely to receive greatest effects are largely limited to those located within the site or located directly adjacent to it where new housing is proposed.
- 7.111 The site lies within the Metropolitan Green Belt. The built development areas of the Illustrative Masterplan do propose to take land from the Green Belt but offers extensive compensatory improvements to the undeveloped parts of the site in the Green Belt, including the northern part of the site. These improvements include ecological management and enhancement and more formalised public access across the wider site.
- 7.112 The proposed development has been designed to ensure that the development is set within a substantial Green Infrastructure network with the majority of the existing site features of landscape value being retained. A substantial portion of the site is proposed as Green Infrastructure (c.88% or 52ha). The proposals would include new planting to enhance the existing boundary trees and hedgerows along the southern site boundary, new flower rich grassland replacing existing low-quality grassland, new tree, scrub and woodland planting to help increase biodiversity and provide new ecological connections as well as visual mitigation.
- 7.113 Overall, the site is considered to have capacity to accommodate a well-designed and considered development as set out within the application proposals. The landscape and visual effects would be very limited and localised, largely as a result of the location of the scheme, contained by the existing landscape framework, and by the mitigation designed into the scheme. The effect on Green Belt openness would be similarly limited, with existing woodland largely containing the built development, meaning there would be a negligible effect on Openness beyond the site itself.
- 7.114 A further assessment of the appropriateness of this development in the Green Belt is dealt with at paragraphs 7.9 - 7.26 above. Full details of the landscape visual and openness assessment are set out within the LVA (FPCR).

Heritage & Archaeology

- 7.115 A Heritage Statement, prepared by Andrew Joseph Associates, is submitted in support of this application. The statement confirms that there are no scheduled monuments within close proximity to the site. The nearest is Bletchingly Castle (reference 1013374) 1.1km east-south of the site. Due to the distance, M23 motorway and existing topography and built development, the proposed development would not be visible from Bletchingly Castle and is therefore not considered to have an impact on the setting and significance of the scheduled monument.

7.116 There are 12 Grade II and one Grade II* listed buildings within 1km of the site. Five of which (including the Grade II* listed Church of St Peter and St Paul) lie within 250 m of the site, as show in Figure 9 below.

Figure 9: Listed Buildings within 250m of site (referenced at table 5 of the Heritage Report)



- 7.117 Of these assets the Church of St Peter and St Paul is predicted to have views from the tower filtered by woodland (both existing and proposed) at a distance of 100m north east of the proposed development. However, there are no views anticipated from ground level from the Church itself. Filtered views may be possible from its curtilage. The effect is predicted to be of negligible and is of less than substantial harm when assessed again the threshold of the NPPF test at paragraph 202.
- 7.118 Folly Tower is a mid-19th century Grade II stone tower set amongst later development, 90m south of the proposed development. Views are predicted from the tower of the proposed development area. The effect is predicted to be of negligible magnitude and is of less than substantial harm.
- 7.119 No mitigation, additional to that proposed, is required in relation to the effects upon the setting of designated heritage assets. The residual effects would have no effect upon our ability to appreciate the significance of these designated heritage assets, being the tests set by NPPF and Historic England.
- 7.120 Based upon the extent of the previous workings and restoration, there is very little or no potential for a direct impact upon archaeology, and this has been scoped out of assessment. As part of the previous application, the County Archaeologist supported this view. This proposed development has been substantially reduced in scale. As such, it is considered that the conclusions drawn by the County Archaeologist clearly equally apply and are further upheld by the amendments of the latest scheme.
- 7.121 The proposed development is therefore not anticipated to cause any harm to nearby heritage assets, namely the five listed buildings with 250m of the site.

Flood Risk & Drainage

- 7.122 Waterman, the drainage consultants for the project, attended a pre-app meeting with SCC on the 25 July 2023. The meeting notes are provided at Appendix E of the Flood Risk Assessment.

7.123 SCC also provided a Flood Risk Report, advising on the risk of flooding and SuDS requirement for the site. SCC have also reviewed the first draft of the FRA. The comments received are detailed at Table 1 of the FRA and have been considered within the preparation of the FRA and Drainage Strategy supporting this outline planning application.

Flood Risk

- 7.124 The entire site is designated as Flood Zone 1. This is land defined as having less than 0.1% (1 in 1,000) Annual Exceedance Probability (AEP) of flooding from rivers or sea in any year, classified as a low probability of fluvial flooding.
- 7.125 There are small pockets of ponding at 'high' risk of flooding from surface water. These are due to depressions in ground level, most of which are existing water features, and are all outside of the development areas. Therefore, the risk to the proposals is low and surface water flood risk will not be affected by the proposals.
- 7.126 Additionally, there is an offsite surface water flow route that runs through the south-eastern corner of the Site. This passes to the east of the proposals, outside of any development areas and therefore will not be affected by the proposals.
- 7.127 The proposed development area will be actively drained by the proposed drainage network, which will ensure the development is safe from surface water flooding over its lifetime. Any existing flow routes through the Site will be maintained. Therefore, the proposed drainage strategy will be sufficient to manage the risk of flooding from surface water.
- 7.128 There is a pipe running through the south-west of the Site. The pipe connects a pond upstream of Nutfield Road (A25) to an existing ditch onsite. This flow route will be maintained (either retained or replaced - to be confirmed at Reserved Matters stage) as part of the development of the Site to protect the Site from any surface water flooding and to ensure flood risk is not increased upstream.
- 7.129 These areas are found where there are depressions in ground level, most of which are existing water features. The proposed development area will be actively drained which will resolve any existing flood risk relating to ponding. Any isolated flow routes through the site will be maintained. Therefore, the proposed drainage strategy will be sufficient to manage the risk of flooding from surface water.
- 7.130 The risk of flooding from groundwater, sewers and artificial sources are all assessed to be low.

Drainage

- 7.131 The drainage strategy has been developed to mitigate potential impacts on the local ecology. In line with the drainage hierarchy, surface water runoff will discharge to the Redhill Brook to the north of the site, in line with the existing hydrological regime.
- 7.132 The proposed drainage strategy will collect and attenuate rainwater on site within Sustainable Drainage features (SuDS). The collected rainwater will be released at a controlled (greenfield) rate, in line with Surrey County Council guidance. Flows from each of the residential parcels will be conveyed through to a network of detention basins and ponds to the recreation ponds at the north of the site before connecting into the Redhill Brook via the existing outflow connection.

7.133 The proposed development is not anticipated to cause any harm to the flood risk and drainage on-site.

Sustainability

7.134 QODA have undertaken the Energy and Sustainability Assessment to accompany the planning application. The assessment has been undertaken in line with the main aim of the NPPF: to proactively deliver sustainable development. This proposed sustainable development scheme will support the Government's housing and economic growth objectives set out in the Framework.

7.135 Paragraph 8 of the NPPF sets out the three elements of sustainable development:

- (a) Economic: to help build a strong, responsive and competitive economy,
- (b) Social: to support strong communities and ensuring that a sufficient number and range of homes to meet the needs of present and future generations; and
- (c) Environmental: to protect and enhance our natural, built and historic environment.

7.136 The assessment utilises the technical input from the wider consultant team to enable a holistic and collaborative approach to the sustainability of the proposed development of Nutfield Green Park.

7.137 The Assessment sets out key sustainable principles that can be achieved at the site through the proposed development. These principles range from landscape and biodiversity, and water and drained to sustainable transport and health and wellbeing. The design evolution has been informed by establishing the sustainable co-benefits and key principle set out in the assessment.

7.138 The proposal will deliver low carbon homes through passive design measures, fabric first approach, exploring the potential of Local Energy Resources and District Heat Networks and the use of efficient building services. The proposal will also seek to maximise renewable energy opportunities, considering solar PVs and heat pumps to achieve an all-electric development.

7.139 This embedded sustainable approach, at outline stage, seeks to set the clear intension and parameters of the sustainability credentials of the scheme now. At the same time, the development scheme is also seeking to comply with national policy, as well as policy CSP14 wider policies relevant to all key sustainable principles. In the absence of detailed proposals at this stage, the sustainability objectives and credentials of the proposed scheme should be afforded **moderate weight** in favour of the proposals.

Socio-Economic Benefits and Social Infrastructure

7.140 An Economic and Social Benefits Statement, prepared by Turley Economics, sets out the construction and operational economic impacts as well as the social impacts arising from the proposed development. This is assessed against relevant national and local policy, specifically the NPPF sustainability economic and social objectives within paragraph 8 of the Framework.

7.141 The assessment finds the proposed development will contribute towards local and wider employment generation and economic productivity as well as accommodating growth in the labour force and boosting resident expenditure and public revenues. The construction phase will generate an average of 60 direct, indirect and induced net additional full-time employment (FTE) opportunities and contribute £25.5 million GVA to the cost of LEP area's economic output during the construction period, of which £20 million will be concentrated in Tandridge.

- 7.142 The operation phase is anticipated to generate 110 direct, indirect and induced net additional FTE jobs, including 46 for Tandridge residents. This phase is also expected to generate £7.4 million GVA to the Coast to Capital LEP area's economy each year of operation, inclusive of £5.2 million concentrated in Tandridge.
- 7.143 Regarding social impacts, the assessment concludes the breadth of impacts is likely to be highly significant in the context of local needs and growth ambitions. Social benefits are provided through the creation of employment and skills opportunities; delivering new high quality efficient homes; meeting specialist housing needs for older people; delivering a mix of residential uses and social infrastructure; and encouraging active and low pollution lifestyles.
- 7.144 Further details relating to economic and social impacts are set out within this assessment.
- 7.145 The Statement of Community Involvement (SCI) sets out responses received during the public consultation, some of which related to the economic impact of the proposal specifically relating to the number of jobs expected to be generated. As demonstrated above, these details are provided within this application which will be publicly available for the general public to review.
- 7.146 A Social Infrastructure Assessment, prepared by Turley Economics, assesses the proposed development's generated additional demand on the existing local social infrastructure including education, healthcare, open space and sports and other types of community facilities.
- 7.147 The assessment finds that there is currently sufficient capacity in the existing GP surgeries that could accommodate the additional demand generated by the proposed development. Proposed development retains the flexibility to include flexible healthcare provision on-site should this indeed be required and/or sought as a means of responding to local healthcare needs.
- 7.148 This will help to respond to (and potentially reduce, given the specialist care that will be available) demand for GP facilities in the surrounding area, when considering the needs of the care and extra care provision and in the event that existing residents already living in the locality move to the new development. This flexibility is also able to respond to a specific type of healthcare that may be in need more locally.
- 7.149 Additionally, in the context of the current provision for older person's housing, the assessment finds there remains a substantial need for additional personal and nursing care home beds. It is therefore considered the provision of care homes would provide a notable benefit to supply in Nutfield, Tandridge and Surrey and more widely.
- 7.150 As outlined in the Turley Economics report, the proposed development would provide a range of positive economic, social and community benefits both during the construction phases of the development also in the longer term post completion operational stage with integration of the proposed new and existing residents of the Nutfield settlements. These benefits will generate positive community, health, recreation and well-being attributes for many different societal groups that will have access to this proposed development.

- 7.151 From an economic perspective, both the construction and operational phase of the development will provide opportunities for new employment and will financially contribute to the local economy. Socially the provision of new homes, with a range of types, affordability, adaptability and sizes, will provide much needed homes for all ages and needs of the community, which will complement and enhance the existing community of Nutfield and South Nutfield, as well as its integration with the wider Tandridge area.
- 7.152 Overall, it is considered that proposed economic and social benefits of the proposed scheme should be given **moderate weight** in favour of the proposals.

Noise, Air Quality & Odour

- 7.153 The application is supported by a Planning Noise Assessment, prepared by Noise Solutions Ltd, which looks at the prevailing noise around the site and looks at the impact of these upon the proposed uses. It confirms that appropriate target internal noise levels are achievable via the conventional mitigation measures, such as appropriate glazing and ventilation, proposed as part of the scheme. This accords with policy DP22.
- 7.154 The assessment also finds the external daytime noise levels are expected to be met when the acoustic screening effects of the proposed dwellings and garden walls and fences is taken into consideration. Additionally, no evidence of noise or vibration caused by quarrying or landfill activities in the surrounding area were found.
- 7.155 Therefore, considering the above, the Planning Noise Assessment concluded the site is suitable for residential development.
- 7.156 An Air Quality Impact Assessment, prepared by AQ Consultants, is also submitted in support of this application and assesses the construction and operational air quality effects of the proposed development. The proposal will generate additional traffic on the local road network, however the assessment demonstrates there will be no significant adverse effects at any existing, sensitive receptor including the existing neighbouring residents. Best practice mitigation measures will be implemented during the construction stage to reduce dust emissions and therefore the overall effect will be no significant. A subsequent Construction Environmental Management Plan, the submission and approval of which is to be secured by suitably worded planning condition, will set out further details of appropriate measures.
- 7.157 Overall, the construction and operational air quality effects are judged to be not significant, and the assessment demonstrates that future residents and users will experience acceptable air quality, with pollutant concentrations in the Redhill AQMA continuing to be below the Air Quality Objectives.
- 7.158 The development's distances from nearby Mercers South Quarry and Redhill Landfill are sufficient to conclude that dust and fine particle emissions will not impact the health or amenity of the proposed residents/users. The Odour and Dust Assessment, prepared by AQ Consultants, confirms that the development parcels are at a sufficient distance from the Redhill Landfill to conclude odour impacts will not affect the amenity of the proposed residents/users. Information from the Environment Agency suggests that there have been no recorded complaints from residents of Nutfield. AQ Consultants also understand that the landfill will cease to accept waste as early as 2027. This is likely to cease prior to the completion of development.

7.159 The dust and fine particle emissions from the quarry and landfill will not be significant at the site. The assessments have been desktop only at this stage. Further surveys work can be undertaken and secured by conditions and provided at reserved matters stage. Further details are set out in the supporting Odour and Dust Assessment prepared by AQ Consultants.

Utilities

7.160 A Utilities Report has been prepared by QODA to present findings from assessments of electrical, heating and water loads for the proposed development. These loads were evaluated against the capacities of local providers, UK Power Networks (UKPN) for electricity, and Sutton and East Surrey Water (SES) for water. The objective is to confirm the capacities in the local networks and identify any network deficiencies and the need for reinforcement to facilitate the successful development of the site.

7.161 At the time of writing the report, capacity assessments by UKPN and SES are ongoing, and QODA is in anticipation of confirmation from each utility provider. Following the completion of the capacity checks and clarification of any arising matters, QODA will provide a supplemental note or update the Utilities Report and submit to the Council.

8.0 CONCLUSION: THE PLANNING BALANCE

8.1 The proposal seeks:

“Outline planning permission for the development of the site for new homes (Use Class C3) and Integrated Retirement Community (Use Classes C2, E(e), F2), creation of new access, landscaping and associated works to facilitate the development, in phases which are severable (Outline with all matters reserved, except for Access).”

8.2 A summary of the key characteristics of the proposed development is provided below:

- a) Up to 166 residential units inclusive of market and affordable homes and self-build plots (Class C3);
- b) Up to 70 care home beds (Class C2);
- c) Up to 41 extra care facility beds;
- d) Up to 1,500 sqm Class E(e), F2 flexible use floorspace;

8.3 In accordance with Section 38(6) of the Planning and Compulsory Purchase Act (2004), the Development Plan, when read as a whole (S.38[3][b]) is the starting point for the determination of planning applications. The determination is required to be in accordance with the Development Plan unless material considerations indicate otherwise.

8.4 The Tandridge Local Plan (2014) is now substantially out of date, albeit it is still extant, and has not been superseded by a replacement development plan. The relevant policies in the 2014 Local Plan should therefore be the first consideration in the determination of the development proposals applying the first limb of the section 38(6) test. Policy DP1 reflects the Framework’s presumption in favour of sustainable development. Policy DP10 reflects the Framework’s green belt development management test.

8.5 Applying these most relevant and important development plan policies and the development management green belt provisions in the Framework, the applicant has to demonstrate that the benefits of the proposals clearly outweigh the harm to the green belt and any other harm.

8.6 The assessment in this Planning Statement has identified definitional harm to the Green Belt by reason of the proposed development being ‘inappropriate development’. The technical assessment of the scheme has identified limited harm to purpose C of Green Belt and very limited harm to openness. The identified harms to the green belt are required to attract substantial weight pursuant to paragraph 148 of the Framework.

8.7 As demonstrated in Section 7 above, the Applicant contends that there are very considerable planning benefits that, when taken together, clearly outweigh the harm to the Green Belt and any other harm in accordance with policy DP10(B) and paragraph 148 of the Framework.

8.8 A summary of these benefits / other considerations are set out below:

- 8.9 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. This will lead to a policy vacuum in Tandridge with no adopted strategic spatial strategy in place to meet the identified and acute unmet need for market, affordable, self-build, and supported care District housing.
- 8.10 This development proposal can come forward in isolation of the Local Plan review process to meaningfully assist in meeting the unmet need and affordability crisis in the District without disrupting the future spatial strategy that will be prepared under the new Local Plan framework in due course.
- 8.11 The development will deliver much needed housing in a well-designed scheme, complementing its surrounding context, which should be supported and upheld in accordance with the Framework and most important policies of the development plan.
- 8.12 Furthermore, the outline scheme would assist in contributing to the identified acute and persistent housing supply shortfall and would deliver much needed affordable housing at a level above policy requirement in an area of high unmet need. As such, the provision of much needed market and affordable housing should be individually and separately afforded **very substantial weight** in favour of the proposals.
- 8.13 Additionally, the provision of +21.72% BNG on site (without the need for off-site provision or a financial contribution), considerably exceeds the mandatory BNG requirement of 10% to apply for applications submitted after January 2024. In the absence of an adopted Local Plan BNG policy at present, (notwithstanding the recent agreement to introduce a 10% BNG at the Planning Policy Committee meeting on the 21 September) the BNG enhancements to be delivered by the proposed development should also be given **significant weight** in the planning balance.
- 8.14 Other economic and social benefits (moderate weight), the provision of 5% self-build / custom build homes (substantial weight) and the provision of later living, adaptable and care home beds (Class C2) to meet the critically needed supported housing requirement in the District should be afforded **very substantial weight** in the favour of the proposals.
- 8.15 As the technical assessments undertaken in support of the outline proposals robustly demonstrates there are no material 'other harms' arising from the proposals, which cannot otherwise be addressed at the detailed reserve matter stage and/or secured via appropriately worded planning conditions or planning obligations.
- 8.16 The collective planning benefits are considered to be of a very high order in the planning balance and clearly outweigh the identified definitional and actual harm to the Green Belt and any other harm arising from the proposals (if contrary to our analysis it is considered other harm results from the proposals)

- 8.17 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, applying limb 1 of the section 38(6) test, comply with the development plan as a whole. Even if, contrary to our analysis, it is considered that the proposals do not comply with the development plan overall, applying limb 2 of the section 38(6) test it is considered that in any event the material considerations (i.e. planning benefits) in favour of the proposals (as demonstrated in the above analysis) clearly outweigh the harms such that very special circumstances have been robustly demonstrated and permission should be granted for the proposed development without delay.

Appendix 1: EIA Screening Opinion from TDC (TA/2023/737/EIA)

Richard Henley
gh Consulting,
45 Welbeck Street
LONDON
W1G8DZ

If calling please ask for Mark Berry

On 01883 732799

E-mail: mberry@tandridge.gov.uk

Case No: 2023/737/EIA

Your ref:

18th July 2023

Dear Emily,

Application No: TA/2023/737/EIA
Site : Former Laporte Works Site, Nutfield Road, Nutfield, RH1 4HF
Proposal : The proposed redevelopment of the Site to deliver up to 166 residential units, a 70 bed care home and 39-bed extra care facility in buildings up to 2.5 storeys. (EIA Screening)

The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended).

This notice is served pursuant to Part 2, Regulation 6 (6) of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended) ("EIA Regulations) in response to your submission dated 25 May 2023, requesting a Screening Opinion in relation to the proposed development of the land at the abovementioned site in the manner as described.

Based on the information provided to the Local Planning Authority (LPA), Tandridge District Council has considered the proposals and has adopted the Screening Opinion that **Environmental Impact Assessment (EIA) IS NOT REQUIRED.**

In adopting a screening opinion, the Local Planning Authority has had regard to the EIA Regulations, which set out the categories for which Environmental Impact Assessment will be required.

Assessment

The requirement for EIA is either mandatory or conditional, depending on the classification of the project. This, in turn, is based on the likelihood of significant impacts arising. EIA developments are divided into 'Schedule 1 Development' (major developments) and 'Schedule 2 Development' (other developments likely to have significant effects on the environment by virtue of factors such as nature, size or location).

In the event that a development falls within Schedule 2, the Local Planning Authority must assess the likely impacts of the development having regard to the provisions of Schedule 3 of the Regulations.

The proposal is for a development of up to 166 residential units, a 70 bed care home and 39-bed extra care facility. The development is not considered to fall within Schedule 1 of the EIA Regulations. The development is, however, considered to fall within Schedule 2, paragraph 10 (b) of the EIA Regulations:

b) Urban development projects, including the construction of shopping centres and car parks, sports stadiums, leisure centres and multiplex cinemas.

In addition, paragraph 10 (b) of the EIA Regulations set out the following thresholds for screening:

- (i) The development includes more than 1 hectare of urban development which is not dwellinghouse development; or
- (ii) The development includes more than 150 dwellings; or,
- (iii) The overall area of the development exceeds 5 hectares.

The site exceeds thresholds (ii) and (iii).

Subsequently, a Screening exercise has been undertaken having regard to the criteria set out a Schedule 3 of the EIA Regulations and having regard to the guidance available within the Planning Practice Guidance. Overall, it has been concluded that the environmental impacts of the development would not be significant to the degree that an Environmental Impact Assessment would be required.

Conclusion

The LPA has given due consideration to the likely impacts of the proposals in accordance with the EIA Regulations and has adopted a screening opinion that **Environmental Impact Assessment IS NOT required.**

Yours sincerely,



David Ford
Chief Executive

Appendix 2: Previously Refused Planning Application (Ref: TA/2021/1040) Reasons for Refusal Table

	Reason for Refusal	How this application overcomes this
1.	The proposed development would constitute inappropriate development in the Green Belt causing significant harm to the openness and visual amenities of the Green Belt. No very special circumstances exist to clearly outweigh the harm by reasons of inappropriateness and other identified harm. As such, the proposal is contrary to the provisions of Policies DP10 and DP13 of the Tandridge Local Plan Part 2: Detailed Policies and the provisions of the National Planning Policy Framework 2021.	<p>This application has been informed by robust technical assessments to establish 1) the needs case (housing, affordable, care and self-build) and 2) to assess the biodiversity and landscape opportunities to retain the openness of the wider green belt and protect and enhance the biodiversity of the site.</p> <p>A collection of benefits, which are considered to outweigh the harm to the green belt.</p>
2.	The proposed development would constitute an unsustainable form of development, failing to meet the objectives as set out in the NPPF and resulting in a development reliant on the private car. As such, it would be contrary to the provisions of Policy CSP1 of the Core Strategy, DP1 of the Tandridge Local Plan Part 2 Detailed Policies and the National Planning Policy Framework 2021.	<p>The proposed development is concentrated at the southern part of the land parcel to integrate with the wider Nutfield Village.</p> <p>The application will incorporate high quality cycle and pedestrian routes, as an extension to the existing, to encourage the use of such modes.</p> <p>An upgraded pedestrian crossing on the A25 close to the Mid Street junction to improve pedestrian and highway safety.</p> <p>A Framework Travel Plan further includes opportunities for future residents to use the on-site facilities, cycle to Redhill as well as rail station and use the existing bus services to access Redhill, Godstone, Gatwick Airport and Crawley.</p>
3.	The proposed development in respect of its layout would be inappropriate to the surrounding area and cause significant harm to local character and distinctiveness, contrary to Policy CSP18 of the Tandridge District Core Strategy (2008), Policies DP7 and DP8 of the Tandridge District Local Plan: Part 2 - Detailed Policies (2014) and the National Planning Policy Framework 2021.	<p>The architects and landscape team have worked hard to study the character of the local area and ensure that the massing and built form as well as the density and indicative architectural style of the proposed is in keeping.</p>
4.	The proposed development would cause harm to the natural undeveloped character of the landscape contrary to the provisions of Policy CSP21 of the Core Strategy and the provisions of the National Planning Policy Framework.	<p>The layout and extent proposed development parcels has been led by the existing groups of trees and woodland and is focused on the southern part of the site and in the location where the historic buildings were once located (see images in DAS).</p> <p>The illustrative masterplan also ensures the openness and landscape character of the northern part of the site is maintained and protected.</p>

5.	<p>The additional marked increase in activity and traffic would result in further noise and general disturbance to the residential amenities of nearby properties. This combined with the active quarry and landfill sites would result in significant harm to neighbouring residential amenities contrary to Policies CSP18 and DP7 and the provisions of the National Planning Policy Framework 2021.</p>	<p>There are no active quarry or landfill works travelling on and off site as part of this application.</p> <p>There will be an increase in traffic movements but this is anticipated to not cause significant harm to the local road networks. Up to date traffic surveys have tested the roads capacities. See the Transport Assessment.</p> <p>The trips generated will be dispersed throughout the day and the travel plan will promote the use of sustainable transport modes, through the creation of further cycle and pedestrian routes.</p>
6.	<p>The proposed development would introduce further sensitive receptors into the area which would be subjected to heightened noise and general disturbance due to the presence of active quarry and landfill sites resulting in harm the amenities of future occupier's contrary to policies CSP18 and DP7 of the Local Plan and the provisions of the National Planning Policy Framework 2021.</p>	<p>A noise survey is submitted with this application to confirm that there is no significant impact on the future occupant's amenity associated with the active quarry and landfill sites in the local area.</p>
7.	<p>The applicant has failed to demonstrate that the proposed development would not result in significant environmental harm in respect of the construction operations and phasing of construction, the assessment of environmental effects, air quality and mitigation and community benefits contrary to the Local Plan, Regulation 18 and Schedule 4 of the EIA Regulations and the Institute of Environmental Management & Assessment (IEMA) ES Review Criteria.</p>	<p>Further to the noise survey and air quality assessments that accompany the application, the EIA screening opinion from the Council (see Appendix 1 of this Statement) confirms that the development will not result in significant environmental harm.</p> <p>A detailed construction management plan will accompany each RM application.</p>
8.	<p>The proposed scheme makes no provision for the infrastructure contributions required to offset the impacts of the future residents upon local infrastructure and is thus contrary to the provisions of Policy CSP11 of the Core Strategy and the National Planning Policy Framework 2021.</p>	<p>The highway team have been in discussions with Surrey CC Highways to establish what contributions are relevant and suitable.</p> <p>A Social Infrastructure Assessment accompanies this application and clearly highlights that there would be no significant impact on off-site local infrastructure.</p> <p>The Reserved Matters application(s) will be subject to CIL.</p>

9.	<p>The applicant has failed to demonstrate that the development would not impact on existing and potential mineral workings in the vicinity of the site by potential contamination of nationally and regionally important minerals. In addition, the proposed development would have a negative impact on the rate of restoration of Mercers South Quarry site and sand extraction consequently and increasing the number of sensitive receptors in the vicinity of the Mercers South Quarry site contrary to Policies MC1, MC6, MC7 and MC8 of the Surrey Minerals Plan 2011, Policies MA1 and MA3 of the Primary Aggregate DPD 2011 and Policies 5, 6 and 14 of the Surrey Waste Local Plan 2019 and the provisions of the NPPF 2021.</p>	<p>This reason for refusal was related to surcharging of historic landfill areas by the placement of imported inert materials potentially causing contamination of the sand at Mercers Quarry and Chilmead. There is no importation of inert material as a result of this development, as such this reason for refusal is no longer applicable.</p>
10.	<p>The applicant has failed to demonstrate that the proposed development would not pose an unacceptable risk to health or the environment contrary to Policy DP22 of the Tandridge District Local Plan: Part 2 - Detailed Policies (2014) and the National Planning Policy Framework 2021.</p>	<p>The proposed built development is concentrated in the south of the site. Extensive further site investigation work has been undertaken in this area in conjunction with discussions with the pollution control officer. The site investigation has not identified any significant contamination in the southern part of the site which cannot be remediated as part of the development such that there will be no unacceptable impact on mineral resources. See Appendix 3 for the EPG review of the Site Investigation Report.</p> <p>The proposed built development is concentrated in the south of the site. The site investigation, including groundwater and gas monitoring, has not identified any significant contamination in the southern part of the site which it is considered cannot be remediated as part of the development.</p> <p>As is the accepted normal practice for developing sites with historical industrial uses further site investigation work will be carried out pursuant to planning conditions and a remediation strategy, to the extent that it is necessary, would be put in place to achieve ground conditions and a development which is protective of human health and the environment in accordance with appropriate standards.</p>
11.	<p>The applicant has failed to demonstrate that site is suitable for redevelopment and that future development would not be put at risk from stability or subsidence contrary to the provisions of the National Planning Policy Framework 2021.</p>	<p>The proposed built development is concentrated in the south of the site. Extensive further site investigation work has been undertaken in this area in conjunction with discussions with the pollution control officer.</p> <p>The site investigation has not identified any significant contamination or stability issues in the southern part of the site which cannot be remediated as part of the development such that there will be no unacceptable impact on mineral resources. See Appendix 3 for the EPG review of the Site Investigation Report.</p>
12.	<p>The proposed development would make insufficient provision for affordable housing and in the absence of a viability assessment would therefore be contrary to the provisions of Policy CSP4 of the Core Strategy and the National Planning Policy Framework 2021.</p>	<p>The currently proposals look to provide 36% across all C3 units, above the adopted policy requirement of 34%.</p>

13.	<p>The unsustainable location of the site and lack of reliable and regular public transport would not support the provision of care facility in this location and future residents would be largely contained to their setting.</p> <p>The applicant has therefore failed to demonstrate the care provision is appropriately located and would meet the needs of the district and future occupant's contrary to Policies CSP7 and CSP8 of the Core Strategy 2004 and the provisions of the National Planning Policy Framework 2021.</p>	<p>The proposed development is concentrated at the southern part of the land parcel to integrate with the wider Nutfield Village.</p> <p>The application will incorporate high quality cycle and pedestrian routes, as an extension to the existing, to be encourage walking and cycling.</p> <p>There are a number of local bus routes providing services to South Nutfield and Redhill.</p>
14.	<p>The applicant has failed to demonstrate that the proposed development would not result in significant harm to ornithological interests, nor has it been demonstrated that the proposed development would 'conserve and enhance' such interests. The proposed development would therefore be contrary to Policy DP22 of the of the Tandridge District Local Plan: Part 2 - Detailed Policies (2014) and the National Planning Policy Framework 2021.</p>	<p>The ecology team have undertaken extensive survey work, and the application is accompanied by the detailed surveys to demonstrate that there would be no harm to birds and habitats are protected and enhanced through the application.</p> <p>The on-site BNG will exceed 20%.</p>
15.	<p>The applicant has failed to demonstrate that the proposal has had regard to the topography of the site, the importance of trees, groups of trees and woodlands and other important features which need to be retained that contribute to the sylvan character of the area. As such the proposal is contrary to Policy CSP 18 of the Core Strategy and Policy DP7 of the Detailed Policies and the 'Trees and Soft Landscaping SPD' (2017).</p>	<p>The design of this scheme has led by an up to date topographical survey and extensive tree and ecology surveys.</p> <p>The self-seeded trees that emerged following the industrial use of the site, include some woodlands or groups that are mature and provide essential habitats can be protected and enhanced through proposals.</p> <p>Some lesser quality trees will be removed to facilitate the development, but further trees will be planted.</p>
16.	<p>The applicant has failed to demonstrate that the proposed development would not increase flood risk elsewhere, that appropriate SuDS are being proposed nor that ground waters are sufficiently protected. As such the proposal is contrary to Policy DP21 of the of the Tandridge District Local Plan: Part 2 - Detailed Policies (2014) and the provisions of the National Planning Policy Framework 2021</p>	<p>The site lies in Flood Zone 1.</p> <p>The application will be accompanied by a FRA and drainage strategy to ensure that there is no increased risk to flood (fluvial or surface water).</p> <p>A series of ponds will be incorporated throughout the northern part of the site to utilise the topography of the site to feed the existing lakes at the south of the site, which can be utilised for habitat creation and attenuation.</p>

17.	<p>The proposed development would result in less than substantial harm to the heritage significance of St Peter and St Paul's Church, to the Inn on the Pond, to Leather Bottle Cottage and to Charman Cottage, as defined in paragraph 202 of the NPPF. No heritage or public benefits have been demonstrated as part of this application to outweigh such harm. The proposal would therefore be contrary to the provisions Policy DP20 Tandridge District Local Plan: Part 2 - Detailed Policies (2014) and the provisions of the National Planning Policy Framework 2021</p>	<p>The landscape team have worked with the appointed heritage consultant to ensure that the western parcel of development does not result in substantial harm to the church.</p> <p>Church Hill (the road) is not proposed as part of the vehicular access points and the belt of trees on that extent of the site remain.</p> <p>The application will be accompanied by a LVA and heritage statement.</p>
18.	<p>Given the layout of the proposed development the proposal has the potential to impact upon the safe operation of Gatwick Airport which is of national importance as it is likely to attract large numbers of geese and gulls. The proposal would therefore be contrary to Policy CSP 16 of the Core Strategy 2008 and the provisions of the National Planning Policy Framework 2021.</p>	<p>A bird strike assessment will accompany the application.</p> <p>The shape and sizes of the ponds proposed have been considered to ensure that they are not conducive to the take off and landing of geese and gulls.</p>
19.	<p>The proposed development located at a site with limited accessible services by means other than the private car, would be likely to encourage reliance on the private car over more sustainable transport modes such as walking and cycling, and the use of public transport, thus contrary to Policies CSP1 and CSP12 of Tandridge District Core Strategy (October 2008); Policies DP1, and DP5 of Tandridge Local Plan Part 2: Detailed Policies 2014 – 2019 (July 2014) and Section 9 of the National Transport Planning Policy Framework (NPPF) 2021.</p>	<p>The application will incorporate high quality cycle and pedestrian routes, as an extension to the existing, to be encourage walking and cycling.</p> <p>An upgraded pedestrian crossing on the A25 close to the Mid Street junction to improve pedestrian and highway safety.</p> <p>There are a number of local bus routes providing services to South Nutfield and Redhill.</p>
20.	<p>The application as submitted, has not sufficiently demonstrated that the impacts of the development on the highway network in regards to highway capacity and safety, can be satisfactorily accommodated or mitigated, thus contrary to Policy CSP12 of Tandridge District Core Strategy (October 2008); DP5 of Tandridge Local Plan Part 2: Detailed Policies 2014 – 2019 (July 2014); Section 9 of the National Transport Planning Policy Framework (NPPF) 2021; and Surrey County Council Local Transport Plan (LTP3).</p>	<p>The highway consultant has undertaken up to date traffic surveys of the local road network to ensure that there is suitable capacity on the local road to facilities the additional trips generate by the development.</p> <p>The survey results show that there is sufficient capacity on the network.</p>

Appendix 3: EPG Third Party Review of Site Investigation Report (letter dated 8 September 2023)

James Maclean

Nutfield Park (Developments) Limited

08 September 2023

Dear James,

RE: Third party review of geoenvironmental assessments at Nutfield Park

Introduction

We understand that Nutfield Park (Developments) Limited are proposing to develop a site in Nutfield, Surrey within Tandridge District. Tandridge District Council have requested that an independent third party reviews the geoenvironmental work for the application to provide confidence that the key constraints have been appropriately investigated.

The Environmental Protection Group Ltd (EPG) have been employed to review the MJCA ground investigation information and interpretive report. We have reviewed the information provided in draft format and have the following comments.

Overall comments

Overall EPG are satisfied that suitable exploratory investigations and preliminary assessments have been completed and that the risks can be appropriately mitigated via planning conditions. We look forward to reviewing a detailed strategy from MJCA that describes the scope of further ground investigations and assessments for the development.

We offer the following comments/advice for the benefit of the applicant and MJCA in production of their strategy document and future assessments. Relevant section numbers of the report have been included, although some comments are general, or relevant to multiple sections in the document.

Specific comments

Ground gas investigation and assessment

5.7 – Elevated carbon dioxide concentrations could be due to natural processes in Made Ground (biological respiration) or could be due to migration of landfill gas and subsequent oxidation. Analysis of the gas composition or continuous monitoring may provide better insight on this point.

5.16 – Analysis of the gas composition at BH1002 may give an indication of the likely source of methane here. Further monitoring may show that the elevated methane was associated with the temporary conditions in a freshly drilled borehole containing low level organic materials, rather than gas migration from landfills. Or could be associated with degrading hydrocarbons rather than putrescible materials.

During detailed investigations and assessments consideration should be given to continuous monitoring techniques on the boundary with North Cockley and Nutfield Priory landfills as this may prove cost effective in terms of characterising the risk definitively and quickly.

During detailed assessment of the ground gas risk the gas migration pathway should be investigated. The cross sections provided are very useful in terms of understanding the topographic separation between the site and the off-site landfill, although levels may change post-development due to the requirement for cut/fill to form the development platform. Permeability testing should be considered (in natural ground on the site boundary that could act as gas migration pathway) this could be a useful parameter for DQRA for gas migration. In place of site-specific permeability testing analysis of PSD tests and soil descriptions could also be used to obtain approximate values. Careful consideration should be given to the potential for preferential pathways on the site boundary that could encourage lateral migration, via faults/fractures, utilities trenches, or highly permeable strata confined by lower permeability deposits.

The detailed ground gas risk assessment for the western area should take into account the effect of the landfill gas extraction system at North Cockley Landfill and the potential for this to be turned off in the future. Efforts should be made by the applicant (or their consultants) to obtain records of the system. Analysis of its effectiveness can then be completed and this aspect incorporated into the assessment.

5.18 - Low gas flow rates in monitoring boreholes at the edge of the landfill could be as result of the extraction system, and that should be considered in the ground gas hazard classification at the boundary.

Human health investigation and assessment

6.6 – Testing for TPH during future investigations should be via speciated TPH-CWG banding so that results can be compared to specific GAC.

6.9 – Exceedances of GAC for arsenic and beryllium appear to be consistently marginal, and potentially associated with natural geology of the area (ironstone/greensand). Is there a proposal for site-specific tier 2 risk assessment, statistical analysis or additional testing for these parameters (such as bioavailability) during detailed investigations in order to ensure the most sustainable remedial option (i.e. avoiding an unnecessary cover layer system).

Consideration should be given to the methodology for assessment of the Vapour Intrusion pathway for the site. Given the preliminary findings we do not consider it likely to be a significant consideration at the site, and a qualitative assessment is likely to be sufficient. However, recent investigations lack collection of relevant data to inform this (i.e. TPH-CWG tests on soils, PID screening of soil or monitoring wells, BTEX & TPH-CWG and VOC tests on groundwater). These techniques should be considered particularly targeted to potential contaminant sources, i.e. areas of any former works/tanks and in locations with visual cues such as BH1002.

Proposed development implications

8.17 – Use of vibro stone column foundations may not be suitable for the site, particularly in areas adjacent to landfills, as these can introduce pathways or reservoirs for ground gases to accumulate. This should be considered by the developer as they determine their foundation solution for the site.

8.20 - Due to the sensitivity of the water environment at the site (aquifers in the bedrock). It may be necessary during detailed investigations to obtain leachability testing on potentially contaminated materials. Particularly if these soils are potentially contaminated with metals, and a cut and fill earthworks exercise is proposed that will move materials about and potentially encourage leaching/mobilisation of

contaminants. Assessment of results from water samples only will not take account of this potential pathway.

Closing remarks

We think that a positive next step would be to arrange a meeting between EPG and MJCA to discuss the strategy for further investigation and assessment. We can then review the proposed scheme of further investigation and provide comment.

Please don't hesitate to get in touch if you wish to discuss anything about these comments.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Amy Juden', with a long horizontal flourish extending to the right.

Amy Juden

Head of Geoenvironmental, The Environmental Protection Group

07538 137 845

Appendix 4: Relevant Core Strategy and Local Plan Part 2 Policies

Policy	Summary
Tandridge District Council Core Strategy (2008)	
Policy CSP 2 “Housing Provision”	Sets out the Council’s housing target of at least 2,500 dwellings in the period 2006 and 2026.
Policy CSP 4 “Affordable House”	The Council sets out a requirement of 34% dwelling to be affordable on sites within the rural areas of 10 units or more. Affordable housing may be in the form of social rented or intermediate or a mix of both.
Policy CSP 7 “Housing Balance”	<p>The Council requires all housing developments of 5 units and above to contain an appropriate mix of dwelling sizes having regard to density ranges set out in Policy CSP 19.</p> <p>The Council encourages the provision of housing for elderly people.</p>
Policy CSP 8 “Extra Care Housing”	Through granting of planning consents the Council will provide at least 162 units of extra care housing up to 2016 and additional units in the period of 2017-2026.
Policy CSP 11” Infrastructure and Services”	Developments will be required to make contributions towards improved infrastructure and services necessary to support the proposed development.
Policy CSP 12 “Managing Travel Demand”	<p>Developments are required to have regard to high design standards and vehicle and other parking standards.</p> <p>Make improvements to the existing infrastructure network where possible including for pedestrians and cyclists and those with reduced mobility.</p>

Policy CSP 13 “Community, Sport and Recreation Facilities and Services”

Residential development may be required to include appropriate open space, play areas and other accessible green space, contributing to the enhancement of such facilities.

Policy CSP 14 “Sustainable Construction”

Sets out sustainable standards relating to residential development, including minimum CO2 percentage savings (20%).

CSP 15 “Environmental Quality”

Sets out high quality, flexible, safe living environment standards to minimise the impact on natural resources including, but not limited to:

- Secured by Design standards
- SUDS to be included where necessary
- Encourage homes to comprise “Lifetime Homes” principles
- Encourage innovative construction methods

Policy CSP 17 “Biodiversity”

Developments should protect biodiversity and provide for the maintenance, enhancement, restoration and, if possible expansion of biodiversity.

Policy CSP 18 “Character and Design”

Required new development within villages and the countryside is of a high standard respecting the character, setting and local context.

Development must have regard to the topography of the Site, important trees or groups of trees and other important features that need to be retained.

Policy CSP 19 “Density”

Sets out the density ranges for rural areas to be 40 dwellings per hectare unless this would conflict with the local character and distinctiveness of an area.

Policy CSP 21 “Landscape and Countryside”

Conserve and enhance the District’s distinctive landscapes and countryside character.

Local Plan Part 2: Detailed Policies (2014)

Policy DP1 “Sustainable Development”	Positive approach that reflects the presumption in favour of sustainable development contained in the NPPF and secure development that improves the economic, social and environmental conditions in the area.
Policy DP5 “Highway Safety & Design”	<p>Development will be permitted where the proposal:</p> <ul style="list-style-type: none"> a) Complies with Highway Authority’s and guidance b) Does not impede the free flow of traffic c) Retains or enhances existing footpaths and cycleway links d) Safe and suitable access to the site e) Effectively mitigate impacts arising from the development
Policy DP7 “General Policy for New Development”	<p>Require high quality design, integrating effectively with its surroundings, reinforcing local distinctiveness and landscape character.</p> <p>Sets out standards for design of development; safeguarding amenity; and safeguarding assets, resources and the environment.</p>
Policy DP9 “Gates, Fences, Walls and Other Means of Enclosure”	Planning permission will be granted where, in rural areas, proposals seek to incorporate native hedging, shrubs or low wooden fencing as they are generally considered to be more in keeping with the informality of such areas.
Policy DP10 “Green Belt”	Within the Green Belt, planning permission for any inappropriate development which is, by definition, harmful to the Green Belt, will normally be refused. Proposals involving inappropriate development in the Green Belt will only be permitted where very special circumstances exist, to the extent that other considerations clearly outweigh any potential harm to the Green Belt by reason of inappropriateness and any other harm.

Policy DP13 “Buildings in the Green Belt”

Unless very special circumstances can be clearly demonstrated, the Council will regard the construction of new buildings as inappropriate in the Green Belt.

The policy goes onto set out exceptions for new buildings in the Green Belt.

Policy DP18 “Community, Sports and recreational Facilities”

Proposals for the provision of new community, sports and recreational facilities will be encouraged where they are sustainably located and are suitable to meet the needs of the local community.

Policy DP19 “Biodiversity, Geological Conservation and Green Infrastructure”

There will be a presumption in favour of development proposals which seek to:

1. Protect, enhance or increase the provision of, and access to the network of multi-functional Green Infrastructure (GI);
2. Promote nature conservation and management;
3. Restore or create Priority Habitats; or
4. Maximise opportunities for geological conservation.

Policy DP21 “Sustainable Water Management”

Proposals should seek to secure opportunities to reduce both the cause and impact of flooding; for example through the use of Green Infrastructure for flood storage and, where necessary, the incorporation of Sustainable Drainage Systems (SuDS).

Policy DP22 “Minimising Contamination, Hazards and Pollution”

Proposals for development on land that is or may be contaminated will be permitted provided that there will be no unacceptable risk to health or the environment and provided adequate remedial measures are proposed which would mitigate the effect of any contamination and render the site suitable for use.



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