Trandridge District Council Local Plan Examination in Public

Matter 2: The Provision of Housing
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## Matter 2: The Provision of Housing

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1. Introduction

1.1. We write on behalf of, Charterhouse Strategic Land (CSL), in support of representations made to the Examination of the Tandridge District council (TDC) emerging Local Plan, July 2018.

1.2. CSL have acquired an interest in the Land West of Limpsfield Road. Our client's site (identified on the Site Location Plan at Appendix 1) was assessed as part of the Council’s Housing Economic Land Availability Assessment (HELAA) under site reference number WAR 005. The site is identified for release from the Green Belt in the emerging Local Plan and forms part of a wider area that is subject to a draft policy allocation for development (Policy HSG15: Land West of Limpsfield Road, Warlingham).

1.3. We have previously made representations on the emerging Local Plan during the Regulation 19 consultation.

1.4. During the July 2018 consultation (Regulation 19 version) our client’s site and the site to the north (now in the control of CALA Homes), was assessed as one single site. At this stage, the wider site’s proposed infrastructure requirements included the relocation of the Warlingham Village Primary school.

1.5. As part of our representations, dated 10 September 2019 (attached in Appendix 2), we welcomed the site’s removal from the Green Belt for residential development and considered that further research would be required to assess the need for the school.

1.6. TDC then submitted the Publication Version (January 2019) of the Local Plan to the Inspector and split the site into two parts, Parcel A to the north of the site (now in the control of CALA Homes) and Parcel B, our client’s site. However, our client was not given the opportunity to respond to a significant alteration to the wording of the policy. The Inspector’s initial letter, dated 29 March 2019, has since reviewed the January 2019 Local Plan version and confirmed that main modifications to the Plan are subject to consultation and, therefore, the Inspector is assessing the Regulation 19 Local Plan version, i.e. Local Plan drafted in July 2018.

1.7. Based on our understanding of the Inspector’s letter dated 29 March 2019 (Examination document ID2), the examination will relate explicitly to the July 2018 version of the Local Plan which was subject to consultation as part of Regulation 19. Through these MIQs, the Inspector is inviting representors to comment on the changes made to the Local Plan post-Regulation 19 (the January 2019 submission version). However, it is not considered that these changes are necessary for soundness and, therefore, these hearing statements refer wholly to the Regulation 19 version of the Local Plan (July 2018) unless expressly stated.

1.8. We also provided representations to the draft Housing Strategy 2019-2023. Our representations, dated 24 October 2018, concluded that Policy HS1, HS4 and HS5 should be flexible enough to ensure that the required housing can be delivered within the plan period. Our representations to this consultation have been attached in Appendix 3 of this report.

1.9. As part of the Examination of the Plan, we seek to respond to Matters 2, 4 and 6 on the Inspector’s agenda.

1.10. This Written Statement responds to the questions set out in Matter 2: The Provision of Housing. In short, we welcome the provision of housing in this sustainable location.
2. **Matter 2: The Provision of Housing**

**A: Calculation of the Objectively Assessed Need for Housing (OAN)**

**Issue:** Is the basis for establishing the OAN for Tandridge consistent with national policy and guidance?

“2.1 Is the preparation of the SHMA on the basis of a Housing Market Area (HMA) defined for Tandridge District justified? Is the definition of the HMA consistent with the Planning Practice Guidance?”

2.1. No comments.

“2.2 Is the use of the 2016 based household projections justified in calculating the OAN for the District and is it consistent with the Planning Practice Guidance?”

2.2. In the Inspector’s initial letter to the Council dated 29 March 2019 (Examination document ID2), the Inspector makes it explicitly clear that the Examination will relate to the “Regulation 19 version of the Plan which was published in July 2018” and therefore, will **not** be responding to the changes set out in Regulation 22 submission version.

2.3. The preparation of TDC’s emerging Local Plan and the consultations required under Regulation 18 and 19 of the Town and Country Planning (Local Planning) Regulations 2012, were based on an OAN calculated using the 2014-based household projections. Using these projections, TDC’s housing need is 9,400 homes over the plan period. Following the conclusion of the Regulation 19 stage in early September 2018, the Office for National Statistics (ONS) published its 2016-based household projections. This saw a marked drop in the housing requirement across the country. The use of the 2016-based household projections means that TDC’s housing need would drop to 7,960 dwellings over the plan period.

2.4. In October 2018, and importantly before the submission of TDC’s Local Plan to the Secretary of State, the Government went out to consultation on the standard methodology and the 2016-based household projections (Technical consultation on updates to national planning policy and guidance, 13 October 2018). In this document, the Government renewed its commitment to deliver 300,000 homes a year and set out in paragraph 19 that in response to the new ONS household projections, in the short term, the 2014-based data will provide the demographic baseline for assessment of local housing need. This position was further cemented when paragraph 2a-005-20190220 of the Planning Practice Guidance (PPG) was updated in February 2019.

2.5. Paragraph 015 Reference ID: 2a-015-20190220 (revision date 20 February 2019) of the Planning Policy Guidance (PPG) states that: “any method which relies on using the 2016-based household projections will not be considered” as these projections do not “provide an appropriate basis for use in the standard method”. The Regulation 19 version of the Plan uses the 2014-based household projections and sets an Objectively Assessed Need (OAN) of 9,400 dwellings across the Plan period. Therefore, the use of the 2016-based projections to calculate the OAN is not justified and is clearly not consistent with the PPG. Accordingly, the Examination should proceed on the basis of an OAN of 9,400 homes.

2.6. Therefore, it is clear that the use of the 2016-based projections is not in line with national policy and do not constitute positive plan making.

“2.3 Is the 20% Market Signals adjustment justified?”
Paragraph 2a-019-20140306 of the Planning Practice Guidance (PPG) states that the housing need figures should be adjusted to reflect appropriate market signals. These signals include land prices, house prices, rent, affordability, the rate of development and overcrowding.

The 2018 affordability ratios show that TDC has an affordability ratio of 15.62, meaning that the median price paid for a residential property is 15.62 times higher than median gross annual earnings. TDC’s affordability ratio is higher than the Surrey average of 13.17 and the national average of 8 (ONS 28 March 2019). Levels of affordability have worsened over the last 20 years which points to a critical level of need in the district which has been exacerbated by low levels of delivery.

In order to try to address the acute affordability issues, and to demonstrate positive plan-making it is considered that it is justified that a minimum of 25% be applied to take account of market signals.

“2.4 Is the approach to defining affordable housing needs justified?”

TDC has a critical and historic undersupply of housing which includes an undersupply of affordable housing. TDC’s affordable housing need exceeds the housing target of all tenures of housing being proposed by TDC. To deliver a greater level of affordable housing, the overall housing figure should be increased to help address affordable housing needs.

“2.5 Are the assumptions made in respect of employment growth realistic?”

No comments.

“2.6 Are there other relevant factors to be taken into account in calculating the OAN?”

Please refer to comments on question 2.2 (included in between paragraph 2.2 and 2.6 of this report).

B: The housing requirement

Issue: Is the plan positively prepared and justified given that the Plan provides for 6,056 homes in the Plan period, against the OAN of 9,400 as set out in the Publication Plan and the OAN of 7,960 set out in the document Updating the Objectively Assessed Housing Needs of Tandridge (HNS5)?

“2.7 Is the Plan justified in not meeting the full OAN for Tandridge and is it consistent with paragraph 14 of the Framework?”

The Plan is not justified given it is failing to meet the full OAN over the Plan period. Whilst it is acknowledged that under paragraph 14 of the Framework there are provisions for not meeting the OAN, it must be demonstrated that every effort has been made to meet this target.

Under paragraph 83, the Framework allows for Green Belt boundaries to be altered in exceptional circumstances through the Local Plan process and these boundaries should be capable of enduring beyond the Plan period. The Council’s strategy to remove land from the Green Belt under exceptional circumstances is welcomed However, it is considered that more should be done to meet TDC’s OAN. Our client’s site together with the wider HSG15 allocation, for example, could deliver significantly more homes than the 190 allocated to it. We address this point further in our response to Matter 6.

“2.8 Have all realistic options for meeting the OAN within Tandridge in full been exhausted?”

TDC has not fully considered how an increase in housing numbers could be delivered from sustainable sites which are already allocated through the emerging plan, such as allocation
HSG15. Our client has prepared a Vision document which shows that a significant increase of housing which can comfortably be provided on the Greenacre Sports site (LPA ref. HSG15). The Vision document has been attached Appendix 4.

2.16. As set out in our Regulation 19 representations, we believe that Policy HSG15 should be amended to allow for a provision of a minimum number of dwellings. As demonstrated in the Vision document, the site can deliver up to 150 units and a 90-bed care home. This is in the interests of positive plan making and will aid the Council in meeting its OAN.

“2.9 What are the consequences of not meeting the OAN within the HMA for delivering a wide choice of high-quality homes, widening opportunities for home ownership and creating sustainable, inclusive and mixed communities which meet the needs of different groups in the community?”

2.17. The decision to not meet the OAN within the HMA will result in a further worsening in affordability in the district. There will be an increase in the level of undersupply meaning that there will be a critical need, including affordable homes which is a specific identified need that is not being met. Not meeting the housing need will also harm the economic prospects of the district and will constrain economic growth. Further, TDC’s close relationship with the London HMA means that it has a responsibility to support the wider economic region that it benefits from and to aid in stopping the worsening affordability of this area.

“2.10 Would and/or where would any unmet housing need arising in the Tandridge HMA during the Plan period be met?

2.18. There is a significant level of unmet need in the HMA, and there is no credible strategy for resolving this. Surrounding local authority areas share similar land-use constraints to Tandridge and most recently Reigate and Banstead Borough Council (RBBC) has decided not to update its housing target policies under the new five-year local plan review procedure, due to its identified Green Belt and flooding constraints.

2.19. The implementation of the standard method within the next five years will see a further increase in housing numbers and will result in a continued worsening of the affordability ratio and undersupply of homes against the need. The Council, therefore, needs to develop a sound strategy to try to meet this need.

2.20. The most appropriate and deliverable approach is to increase the early delivery and capacity of sites which are already allocated for release from the Green Belt for development. Sites such as allocation HSG15 have already been demonstrated to be sustainable sites for development and therefore have the potential to support greater levels of housing to help meet TDC’s OAN.

C: The overall supply of housing

Issue: Is the proposed supply of housing for the Plan period realistic?

“2.11 Does the housing trajectory set out in the Housing Topic Paper (HNS2) provide a sound basis for meeting the identified housing need?”

2.21. No comments.

“2.12 Is the housing trajectory realistic and deliverable in terms of its components and are there any threats to delivery?”

2.22. The site allocated within Policy HSG15 (Greenacre Sports) is currently in its early stages of conception for development. A Vision Document (attached in Appendix 4) shows an initial design of the layout of the site to deliver much-needed housing. The main component that threatens the delivery of housing on the site is TDC’s allocation of a school in this location. Further detail of this has been set out in our response to Matter 6.
“2.13 Is the contribution towards housing supply of housing from windfall, town centre initiatives and the predicted supply of 20 vacant dwellings per annum being brought back into use realistic and justified?”

2.23. No comments.

“2.14 Is it justified that HSG20: North Tandridge: One Public Estate (NTOPE), Caterham is included in the housing trajectory?”

2.24. No comments.

“2.15 In broad terms, is the housing development proposed in the Plan and set out in the trajectory based on a sound understanding and robust evidence of viability?”

2.25. No comments.

“2.16 Given that the proposed South Godstone Garden Community is intended to deliver around 1,400 new homes in the Plan period and the details of the development would be considered by an Area Action Plan (AAP), would it be effective to include within the Plan a Policy which commits the Council to a review of the Plan if the AAP is not adopted by a specified date in order to sustain the supply of housing?”

2.26. No comments.

D: Five year housing land supply

Issue: Would the Plan secure a five year supply of deliverable housing sites?

“2.17 Will the Plan provide for a five year supply of deliverable housing sites on adoption?”

2.27. No comments.

“2.18 In the context of paragraph 47 of the Framework, is it justified to apply a buffer of 5% within the calculation of the five year supply?”

2.28. No comments.

“2.19 What are the implications of the Housing Delivery Test for the five year supply of housing after the Plan is adopted, having regard to the application of the appropriate buffer as set out in paragraph 73 of the revised updated National Planning Policy Framework 2019?”

2.29. Even if the Housing Delivery Test (HDT) is recalculated as the Council suggest, they would still struggle to meet their own targets, let alone the OAN. Our client’s site as shown in Policy HSG15, Greenacre Sports, is deliverable immediately and, therefore, can contribute to the council’s housing land supply and future HDT reviews.

E: TLP:12 Affordable Housing Requirement

Issue: Is the OAN for affordable housing justified and in line with national policy and guidance?

“2.20 Does the SHMA’s approach to calculating affordable housing need, comply with the stages set out in the Planning Practice Guidance?”

2.30. No comments.

“2.21 Policy TLP12 sets affordable housing requirements for developments within the Tiers 1 and 2 of the settlement hierarchy, in respect of sites released from the Green Belt and
elsewhere. Would the policy be effective in ensuring the OAN for affordable housing is met?

Considerations include:

• Are the affordable housing requirements set at levels which maximise the delivery of affordable housing whilst not affecting the deliverability and viability of the Plan?
• Is there a need to increase the housing requirement to help deliver more affordable housing?
• What is the justification for the 15 dwellings or over threshold in Tier 1 settlements?
• Is the policy justified in applying the affordable housing requirement to housing sites of five dwellings and over outside of Tier 1 and Tier 2 settlements and sites allocated as Green Belt Releases and is it consistent with national policy set out in the Written Ministerial Statement (WMS) of 28 November 2014 and the Planning Practice Guidance (031 Reference ID: 23b-031-20160519) on support for small-scale developers, custom and self-builders (or the Framework 2019)?
• The Policy states that the tenure and size split will be determined by the Council’s most up to date Housing Strategy. Is the Policy, in requiring compliance with the Housing Strategy consistent with national policy given that the Housing Strategy is not part of the development plan?"

2.31. We do not agree with the approach that the Council has taken with regards to affordable housing requirements. Allocations for development within the Urban Area are required to provide 20% affordable housing above 15 dwellings and Green Belt allocations are required to provide 40% affordable housing. It is understood that the Council has undertaken a viability assessment of proposed allocations. However, we do not believe that this has sufficiently taken into consideration the potential risks and unexpected costs which may occur through the application and construction process.

2.32. It is, therefore, considered that a sound and justified approach would be to incorporate flexibility into the policy which takes account of viability. This should also be included in the individual housing allocation policies such as HSG15. Such sites have already been identified and allocated for development and, therefore, to require such a high level of affordable housing provision on former Green Belt sites and not take account of viability has a negative impact on the deliverability of housing in the Plan period. Reducing the delivery of housing in such a way will further reduce affordability and so exacerbate the problem that TDC is seeking to resolve.

“2.22 Are the proposed Modifications to Policy TLP12 necessary for soundness?”

2.33. Please see paragraph 2.32 and 2.33 above.

F: Provision for Gypsies, Travellers and Travelling Showpeople

Issue: Is the Plan positively prepared and would it be effective in addressing the likely accommodation needs of Gypsies, travellers and travelling showpeople?

2.34. We have no comments to add on this section.

TLP15: Gypsy, Traveller and Showpeople Provision

2.35. We have no comments to add on this section.

TLP16: Traveller Pitch/Plot Design

2.36. We have no comments to add on this section.
Land west of Limpsfield Road, Warlingham, Surrey

Site Plan
Local Plan Consultation
Strategy Team
Tandridge District Council
Station Road East
Oxted
Surrey
RH8 0BT

By email only

10 September 2018

Dear Sir/Madam

REPRESENTATIONS TO THE TANDRIDGE DC LOCAL PLAN PUBLIC CONSULTATION (REGULATION 19)

LAND WEST OF LIMPSFIELD ROAD, WARLINGHAM (REF WAR 005)

On behalf of our client Charterhouse Strategic Land Ltd (CSLL), we wish to make representations in respect of the emerging Local Plan. CLL have acquired an interest, in the Land West of Limpsfield Road. Our client’s site (identified on the attached Site Location Plan) was assessed as part of the Council’s Housing Economic Land Availability Assessment (HELAA) under site reference number WAR 005. The site is identified for release from the Green Belt in the draft Local Plan and forms part of a wider area that is subject to a draft policy allocation for development (Policy HSG15: Land West of Limpsfield Road, Warlingham).

It is our client’s intention to provide further comment on the Local Plan and Policy HSG15 at the Examination stage.

These representations support the selection process underpinning the Council’s identification of site WAR 005 as suitable for development. As such, in principle, our client has broad support for draft Policy HSG15. Site WAR 005 is suitable, available and deliverable.

These representations also provide comment on other draft policies in the Local Plan which will influence and shape any future development at site WAR 005.

Attached to these representations is a completed version of the Council’s ‘Our Local Plan: 2033 Consultation – Legal Compliance and Soundness Questionnaire’. This questionnaire confirms our client’s request to participate at the Examination Hearings in order to support development at site WAR 005 and shape policies within the Local Plan, including Policy HSG15.

Site and Settlement Sustainability

The Site
Site WAR 005, forms approximately 6.86ha of the 10.9ha draft site allocation identified in draft Policy HSG15. The site is roughly rectangular in shape and currently comprises of a recreation ground with associated pitches, playing fields, club house and car parking. To the north west of the buildings associated with the recreation ground is an area of woodland. The northern portion of the site beyond the sports pitches is an area of under used scrub land.

Adjacent to the site’s southern boundary is residential development fronting Shelton Avenue. The site is bounded by Limpsfield Road to the east, off which there is an existing vehicular site access. Beyond Limpsfield Road lies further residential development and a care home. Adjacent to the site’s western boundary is paddock land. To the north of the site lies the remainder of the land (HELAA Site Ref: WAR 036) identified for development as part of draft Policy HSG 5.

The site’s perimeter is lined by mature vegetation and trees except at the point of access off Limpsfield Road. This vegetation screens the site from the Green Belt land to the west.

The site lies entirely within Flood Zone 1 and as such is at a low risk of flooding. The nearest listed buildings are the Grade II* listed Church of All Saints and the Grade II First World War memorial, located approximately 300m to the east and south of the site respectively.

The Settlement

The site adjoins the current settlement boundary of Warlingham. Draft Policy TLP06 identifies Warlingham as an ‘Urban Settlement’. Urban Settlements are identified as ‘Tier 1’ settlements and as such are the most sustainable settlements in the district. Warlingham possesses a wide range of shops, services and public transport links making it a sustainable location for growth. Table 1 appended to this letter demonstrates the site’s sustainability in terms of access to services.

In respect of public transport links, there is an existing bus stop on Limpsfield Road immediately adjacent to the site. This stop provides a frequent daily service (Service No.403) to West Croydon where there are interchange opportunities with London Overground and National Rail services. Bus route 409 serves the same bus stop. This service provides an hourly direct link to Upper Warlingham Station and Whyteleafe Station.

In summary, Table 1 demonstrates that site WAR 005 is a sustainable site for residential development in terms of accessing shops, services and public transport links to meet the day to day needs of local residents. Warlingham also benefits from excellent public transport links which future residents of the site would have convenient access to. We endorse the Council’s decision to identify Warlingham as an ‘Urban Settlement’ in the draft Local Plan. As such it is entirely appropriate for the Local Plan to make allocations for residential development at Warlingham. Assigning growth to Warlingham will safeguard the vitality and viability of existing services in line with paragraphs 77 and 78 of the National Planning Policy Framework (NPPF).
Site Selection and Green Belt Review

In identifying suitable and available land for development the Council have completed a HELAA, Green Belt Assessment and Sustainability Appraisal.

Site WAR 005 was assessed as ‘developable’ by the HELAA in respect of its suitability, availability and deliverability. The HELAA states that the site had a potential yield of 120 dwellings. In light of our own review of site constraints, we support the Council’s HELAA assessment in terms of the site being ‘developable’ and capable of coming forward during the early part of the plan period. However, we consider that the site can deliver more than housing that is suggested in the HELAA.

Green Belt Assessment

Due to the site’s existing Green Belt designation, it was subject to assessment as part of the Council’s three part Green Belt Assessment (GBA) process. The Part 1 GBA identified an area (Ref: 007) around Warlingham, including site WAR 005, as worthy of further investigation in respect of its potential for release from the Green Belt. The Part 2 GBA then considered the merits of this area further and recommended that specific parcels should be subject to more detailed consideration as part of the Local Plan preparation process. As such, site WAR 005 was rightly subject to a detailed and specific site assessment in Part 3 of the GBA. The specific site assessment (Ref: WAR 005-282) examines the site against its contribution to the wider Green Belt and concludes that “the site does justify the exceptional circumstances necessary to recommend an amendment and of the Green Belt boundary”. The assessment rightly notes the site’s compliance with the Local Plan spatial strategy which is to focus development at Urban Settlements, the site’s sustainability credentials, and its potential to deliver a sensitive landscape led design at the planning stage to mitigate any perceived harm on the wider Green Belt.

Having reviewed the Green Belt Assessment process undertaken by the Council we consider its conclusions in relation to site WAR 005 to be robust.

Sustainability Appraisal

The NPPF requires Local Plans to be underpinned by a Sustainability Appraisal (SA). In this case, the draft Local Plan has been published alongside a SA which assesses Warlingham in terms of it suitability to accommodate growth and the sustainability of site WAR 005. These assessments confirm the following:

• Warlingham is the third most sustainable settlement in the district when assessed against the all sixteen sustainability objectives; and

• Site WAR 005 has either a positive or neutral impact on thirteen of the sixteen sustainability objectives thus making it one of the most sustainable development sites in Warlingham. As our client continues to progress the site through the Local Plan and planning process there is potential for the site’s negative ratings in respect of land contamination and biodiversity to be mitigated by the
implementation of appropriate on site measures.

The SA also assesses the wider site allocation (HSG15) against sustainability objectives.

In light of the above we are satisfied that an appropriate SA process has taken place in order to justify Warlingham as suitable location to accommodate growth and site WAR 005 as sustainable development site.

Summary

In respect of our client’s site, it evident that the Council’s approach to site selection and subsequent assessment in terms of sustainability and Green Belt review has been robust. As such, the site's inclusion within the development area associated with draft Policy HSG15 is entirely justified, effective and consistent with national planning policy.

The Site Allocation Policy (HSG15: Land West of Limpsfield Road, Warlingham)

Site WAR 0005 accounts for the largest element of proposed site allocation HSG15. As identified by the Council's evidence base the site is suitable and available for development. Indeed, our client is keen to bring forward proposals for the site in association with the Local Plan preparation process and at the appropriate time in consultation with key stakeholders.

Whilst our client is, in principle, supportive of draft Policy HSG15 and the evidence base identifying the suitability of the site for development, we do have comments regarding the wording of the draft policy. Accordingly, at present we consider draft Policy HSG15 to be unsound in the context of the NPPF's test of soundness. Set out below are observations regarding the wording of the draft policy and proposed wording modifications to strengthen Policy HSG15 and render it sound.

– **Estimated Site Yield**: 190 dwellings – Our Comments: The Local Plan proposes a housing target of 6,056 dwellings over the plan period. This target falls short of the district's objectively assessed housing need (OAN) which is 9,400 dwellings over the plan period. To assist the Local Plan in delivering its housing need and to significantly boost the supply of housing in line with the requirements of NPPF, the policy estimate of 190 dwellings should be proceeded by ‘a minimum of’. This wording amendment would make for a more positive and proactive policy in the context of the district’s rising housing demands. In addition, the suggested wording would ensure that there is sufficient flexibility at the planning stage to utilise the allocation to its full development potential.

– **Infrastructure** – Our comments: Bullet point one requires the site allocation to deliver an on-site 3FE primary school. To make bullet point one a more robust and flexible policy tool capable of responding to changing circumstances such as, the relocation of the 3FE primary school was no longer required or a more preferable solution for the Council came forward, it
is recommended that bullet point one is subject to amendments. It is
recommended that the following text is added to the end of bullet point one,
"or a financial contribution towards increasing the capacity of primary
education in the local area."

The Infrastructure Delivery Plan states that the primary school expansion
and reprovision will be funded by a mixture of the County Council and s106
contributions. We are conscious that the Council’s adopted Community
Infrastructure Levy (CIL) Regulation 123 List states that CIL funding will be
used to fund school places (primary and secondary). As such, we need to
ensure that any financial contributions towards primary education provision
are compliant with the CIL regulations. Our client is committed to working
with the Council, the local education authority and other stakeholders to
identify and assist in the delivery of the most appropriate and robust solution
to meet primary school needs.

Bullet point 2 requires any development to re-provide playing pitches, by
way of a financial contribution, to offset the loss of existing on-site facilities.
Point VII of draft Policy HSG15 states that replacement space will need to be
provided ahead of development. To add flexibility to the policy it is
recommended that Point VII is amended to state "replacement space or a
financial contribution towards replacement space will need to be provided
ahead of development". In addition, it is recommended that the playing pitch
re-provision element of draft Policy HSG15 is rationalised into a single
element to make for a more clear and concise planning policy.

Bullet points 3, 4, 5 and 8 relate to highways improvements that the
development might be required to deliver. The detail of such schemes and
their need to be delivered in order to make any development acceptable in
highways terms will be addressed at the application stage. Indeed, the
deliverability of each specified scheme also needs to be assessed in detail.
Any financial contribution towards specific schemes would need to be
compliant with CIL Regulations and be commensurate to the scale of
development proposed by a planning application.

Bullet point 6 highlights the need for any development to contribute towards
the expansion of a doctors surgery in Warlingham. The Infrastructure
Delivery Plan states that an expansion will be funded by a s106 contribution
from policy allocation HSG15. We note that medical infrastructure is
included on the Council’s Regulation 123 List. As such, we need to ensure
any s106 contribution towards medical infrastructure is compliant with CIL
regulations. In addition, we seek clarity from the Council as to whether this
financial contribution would, in fact, be delivered by CIL payments.

The housing trajectory contained within the Council’s Housing Topic Paper has site
WAR 005 scheduled to deliver residential development in 2030/31 and 2031/32.
We are very confident that the site can come forward sooner than proposed in the
trajectory. Following the adoption of the Local Plan our client will seek to gain
planning approval as soon as practically possible. Any enhancements to the
delivery timetable would assist the Council in meeting the rising housing needs of
the district.

The developer requirements as set out in draft Policy HSG15 would need to be factored into the viability of any development proposals as and when they come forward.

At this time, our client has no comment to make on the Conservation, Landscape, Ecology and New Defensible Boundaries elements of draft Policy HSG15.

Other Planning Policies

TLP12: Affordable Housing Requirement

Draft policies TLP12 and HSG15 identify that the site allocation covering site WAR 005 should deliver 40% affordable housing due to the site currently forming part of the Green Belt and being undeveloped. Draft policy TLP12 also states that sites at ‘Urban Settlements’, such as Warlingham, would usually attract a 20% affordable housing requirement. This significant shift in the level of affordable housing requirement on the basis a site was located in the Green Belt is not justified and will impact on the viability of affected sites.

In the case of site WAR 005 the 20% increase in affordable housing requirement is not be justified and may not be viable when considered alongside the infrastructure requirements listed in draft policy HSG15. The site’s location on the edge an ‘Urban Settlement’ means that it has a disproportionate amount of developer requirements which other Green Belt allocations at Tier 1 and Tier 2 (Semi Rural Service Settlement) avoid. In addition, site WAR 005, has existing structures on-site making it partially brownfield. Therefore, the blanket 40% requirement on the basis the site is undeveloped is not justified and may not be viable at the planning application stage.

The issue of affordable housing provision and type and tenure mix needs to be considered in the context of wider development viability. As such we welcome the provisions within TLP12 which allow for the submission of a Viability Appraisal should the development be rendered unviable by providing 40% affordable housing. A similar caveat regarding the ability to submit a Viability Appraisal to support any planning application for development should be also be added to draft Policy HSG15.

TLP14: Specialist Need Housing & Extra Care

Our client supports the provisions of this draft policy which seeks the delivery of units of Specialist or Extra Care accommodation where it can be demonstrated that sites are sustainable by virtue of their location. This policy should highlight the potential for site allocations, which are by their very nature sustainable sites, to deliver care facilities alongside other policy requirements. Such an amendment to the policy would focus delivery at the most sustainable locations in the district and maximise the development potential of land.
TLP18: Place-Making and Design

Draft Policy TLP18 is a criteria-based policy which promotes high quality design and the need for development to respect the character of its surroundings. The final paragraph of this policy promotes the use of Design Codes to inform and guide development proposals. Design Codes can be an important tool to shape the delivery of large scale residential developments and urban extensions, usually on sites where 500+ dwellings are proposed. It would be beneficial to include a threshold of 500+ dwellings in Policy TLP18. Such a caveat will allow sites below this threshold to move through the planning process towards implementation at a greater pace.

Conclusion

These representations are, in principle, supportive of draft Policy HSG15 and endorse the site selection process underpinning the Council’s identification of site WAR 005. Site WAR 005 is suitable, available and deliverable and as such is fully capable of accommodating sustainable housing growth in the early part of the plan period. The site will form an important and robust element of the Council’s housing trajectory.

These representations also make a number of comments and proposed modifications regarding the draft wording of policy HSG15. As such, whilst we have broad, in principle, support for draft Policy HSG15, it is contended that the policy is unsound in its current form. However, we are confident that draft Policy HSG15 can be strengthened by the suggested wording modifications to render it sound.

We will be provided further detailed evidence to support the allocation of site WAR 005 as part site allocation HSG15 at the Local Plan Examination stage. As set out on the accompanying completed Local Plan Questionnaire our client wishes to participate in the Local Plan Examination hearings.

Yours sincerely/faithfully

Sean McGrath

Enc: Site Location Plan
Local Plan Questionnaire
<table>
<thead>
<tr>
<th>Service</th>
<th>Closest Facility</th>
<th>Distance from the site</th>
</tr>
</thead>
<tbody>
<tr>
<td>Primary School</td>
<td><strong>Warlingham Village Primary School</strong> 85 Farleigh Road, Warlingham, CR6 9ER</td>
<td>Approximately 0.9km distance which equates to a 12 minute walk. Within walking distance.</td>
</tr>
<tr>
<td>Secondary School</td>
<td><strong>Warlingham School</strong> Titthepit Shaw Lane, Warlingham, CR6 9YB</td>
<td>Approximately 0.9km distance which equates to a 12 minute walk. Within walking distance.</td>
</tr>
<tr>
<td>Retail</td>
<td><strong>Co-op</strong> 52-58 The Green, Warlingham, CR6 9NA ‘The Green’ area and adjacent streets also contain a garage, pubs, restaurants, hairdressers, beauty salons and hot food takeaway. <strong>Sainsbury’s</strong> 631 Limpsfield Road, Warlingham, CR6 9DY</td>
<td>Approximately 0.3km distance which equates to a 4 minute walk. Within walking distance. Approximately 1.2km distance which equates to a 15 minute walk. Within walking distance. Also accessible via a 9 minute bus journey (Service No. 403).</td>
</tr>
<tr>
<td>Community Facilities</td>
<td><strong>Warlingham Village Hall</strong> 441 Limpsfield Road, Warlingham, CR6 9LE</td>
<td>Approximately 0.4km distance which equates to a 5 minute walk. Within walking distance.</td>
</tr>
<tr>
<td>Doctors Surgery</td>
<td><strong>The Warlingham Green Medical Practice</strong> 1 Church Road, Warlingham, CR6 9NW</td>
<td>Approximately 0.1km distance which equates to a 2 minute walk. Within walking distance.</td>
</tr>
<tr>
<td>Employment Opportunities</td>
<td>Small scale employment opportunities are available at the shops and services located within Warlingham.</td>
<td></td>
</tr>
</tbody>
</table>

Source: Google Maps
Our Local Plan: 2033 (Regulation 19)

This consultation relates to the proposed submission version of Our Local Plan and is being conducted in accordance with Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012. This consultation asks for your comments on the **legal compliance** and **soundness** of the Plan and whether you wish to request involvement in the Examination in Public hearing sessions, which will be determined at the discretion of the appointed Planning Inspector. To assist you in making your comments the Council has prepared a **Guidance Note** on how to respond to this consultation, and sets out the next steps and should be utilised to guide your response as far as is practicably possible.

You do not need to answer every question, only those that relate to the point you wish to make.

**How we will use your information**

In submitting comments to this consultation we are required, under the Town and Country Planning (Local Planning) (England) Regulations 2012, to notify you when the independent examination will take place. We will use the contact details you have provided to do this.

**Please note:** at the end of the consultation period all comments will be made public and will be submitted to the Secretary of State along with the Local Plan and other relevant supporting documents. Your comments and name will be published but other personal information will remain confidential.

Your comments will be reviewed by the independent Planning Inspector appointed by the Secretary of State to carry out the examination in public. You may be invited to discuss your comments at the examination in public at the discretion of the Inspector.

In line with General Data Protection Regulations (2018), your details are stored on a secure system and are used only for the purposes of consultation for the Local Plan and associated documents.

Your details will be stored until such a time that the Local Plan has been adopted. If you do not wish to receive further updates from the Council in relation to the Local Plan, please email [localplan@tandridge.gov.uk](mailto:localplan@tandridge.gov.uk) or log on to your Objective account.

**Please tick below to indicate you have read this notice.**

I have read the notice about how my information will be used...............................√
Legal Compliance and Soundness – Questionnaire

Legal Compliance

Please see the Guidance Note for an explanation of Legal Compliance.

Do you consider the Local Plan is legally compliant/non-compliant? 
(Please select one answer)

☑ Legally Compliant .................................................... Non Compliant .................................................................

Please give details of why you consider the Local Plan is/is not legally compliant, including references to relevant legislation, policies and / or regulations.
Modifications – Legal Compliance

Are you proposing a modification(s) to make the Local Plan legally compliant and/or to strengthen its compliance?
(Please select one answer)

Yes.......................................................... No..........................................................

Proposed Modifications – Legal Compliance

You will need to say why this modification(s) will make the Local Plan legally compliant/strengthen its legal compliance. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and include all information and evidence necessary to support / justify your suggested change. Please be as precise as possible.

After this stage, further submissions for modifications will be ONLY at the request of the Inspector, based on the matters and issues he / she identifies for examination.

Please set out your suggested modification(s) below

Independent Examination - Legal Compliance
If your representation is proposing a modification(s), do you consider it necessary to participate in the examination in public?
*(please select one answer)*

Yes..................................................☐ No.................................................................☐

**Reasons for Attending the Examination in Public - Legal Compliance**

*Please note* attendance at the examination in public is at the discretion of the appointed Inspector.

If you wish to participate in the examination in public, please outline why you consider this to be necessary:

N/A
## Tests for Soundness

Please see the Guidance Note for an explanation of Soundness.  
*(Please select one answer for each question)*

<table>
<thead>
<tr>
<th>Question</th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>Is the Local Plan positively prepared?</td>
<td>☐</td>
<td>☐</td>
</tr>
<tr>
<td>Is the Local Plan justified?</td>
<td>☐</td>
<td>✓</td>
</tr>
<tr>
<td>Is the Local Plan effective?</td>
<td>☐</td>
<td>☐</td>
</tr>
<tr>
<td>Is the Local Plan consistent with national policy?</td>
<td>☐</td>
<td>☐</td>
</tr>
</tbody>
</table>

Thinking about the tests of soundness, do you consider the Local Plan to be sound?  
*(Please select one answer)*

Sound............................................................ ☐ Unsound............................................................ ✓
Please state why you consider the Local Plan to be sound/unsound, including references to relevant legislation, policies and/or regulations.

See attached representations

**Modifications - Soundness**

Are you proposing modification(s) to make the Local Plan sound, or to strengthen its soundness?

*(Please select one answer)*

- Yes…………………………………………..
- No…………………………………………..

**Proposed Modifications – Soundness**

You will need to say why this modification(s) will make the Local Plan sound/strengthen its soundness. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and include all information and evidence necessary to support/justify your suggested change. Please be as precise as possible.
After this stage, further submissions relating to soundness will be ONLY at the request of the Inspector, based on the matters and issues he / she identifies for examination.

Please set out your suggested modification(s) below

See attached representations
Independent Examination – Soundness

If your representation is proposing a modification(s), do you consider it necessary to participate in the examination in public?
(Please select one answer)

Yes..........................................................☐ No..........................................................☐

Reasons for Attending the Examination in Public – Soundness

Please note attendance at the examination in public is at the discretion of the appointed Inspector.
If you wish to participate in the examination in public, please outline why you consider this to be necessary:

See attached representations
**Duty to Cooperate**

Please see the Guidance Note for an explanation of the Duty to Cooperate.

**Do you consider the Local Plan to have met/not met the requirement of the Duty to Cooperate in accordance with section 110 of the Localism Act 2011 and section 33A of the Planning and Compulsory Purchase Act 2004?** Please note that any non-compliance with the Duty to Cooperate is incapable of modification at examination.

*(Please select one answer)*

Met.................................................................................. ☐ Not met.......................................................... ☐

**Please give details of why you consider the Local Plan has met/not met the requirements of the Duty to Cooperate?**
Independent Examination – Duty to Cooperate

Do you consider it necessary to participate in the examination in public?
(Please select one answer)

Yes...........................................☐ No..........................................

Reasons for attending the examination in public – Duty to Cooperate

Please note attendance at examination in public is at the discretion of the appointed Inspector.

If you wish to participate in the examination in public, please outline why you consider this to be necessary:
Uploading/Providing Supporting Information

Please note that you can attach files, such as a scanned map, image or other document, along with your comments. Your documents will be made public as part of the response process. Please note that we have a maximum file size of 10Mb, files larger than this may be rejected by our server.
Local Plan: Monitoring

Awareness
Were you aware that the Council is drafting a Local Plan?
(Please select one answer)

Yes…………………………………………..☑ No…………………………………………..

Previously responded
Have you previously responded to any of the consultations on the Local Plan?
(Please select one answer)

Yes…………………………………………..☐ No…………………………………………..☑

Please give reasons for not responding to any of the Local Plan consultations in the past?
(Please select all that apply)

☐ I didn’t know about the Local Plan………………………………………………………
☐ I don’t feel I can make a difference………………………………………………………
☐ I don’t think it’s relevant to me…………………………………………………………
☐ Other people are making comments on my behalf……………………………………
☐ Other……………………………………………………………………………………

The Local Plan
With regards to the Local Plan, have you:
(Please select all that apply)

☑ Understood the documents………………………………………………………………
☑ Understood what happens next…………………………………………………………
☑ Found all the information you needed………………………………………………
☑ Raised the points you wanted to make………………………………………………

Consultation Awareness
How did you find out about the consultation?
(Please select all that apply)

☐ In the media………………………………………………………………………………
☐ On the internet…………………………………………………………………………
☐ Library…………………………………………………………………………………
☑ Word of mouth…………………………………………………………………………
☐ Parish Council…………………………………………………………………………

Thank you for taking part.
Land west of Limpsfield Road, Warlingham, Surrey

Site Plan
Dear Sir/Madam

REPRESENTATIONS TO THE TANDRIDGE DC HOUSING STRATEGY 2019-2023

On behalf of our client Charterhouse Strategic Land Ltd (CSLL), we wish to make representations in respect of the Tandridge Housing Strategy 2019-2023. CLL have acquired an interest, in the Land West of Limpsfield Road. Our client's site was assessed as part of the Council’s Housing Economic Land Availability Assessment (HELAA) under site reference number WAR 005. The site is identified for release from the Green Belt in the draft Local Plan and forms part of a wider area that is subject to a draft policy allocation for development (Policy HSG15: Land West of Limpsfield Road, Warlingham).

We previously submitted representations on the Council’s emerging Local Plan and it is our client’s intention to provide further comments on the emerging Local Plan at the Examination stage.

The Housing Strategy 2019 - 2023 sets out three priorities that the Council are seeking to achieve within the Borough. These relate to building the homes the Council needs, improving the quality and the use of existing housing stock and meeting the housing needs of vulnerable households. We have reviewed the document and our comments relate to Priority 1: Building the homes we need.

Policy HS1: Market Housing Mix, Policy HS4: Affordable Housing – Tenure Split and Policy HS5: Private Rented Developments refer to housing requirements on development sites, including mix of dwelling, the type of affordable housing to be provided and privately rented developments. All three polices have specific requirements for developments.

However, the evidence base for these policies have assessed the District as a whole and do not acknowledged that site specific circumstances and needs will differ and a ‘one size fits all’ approach is not necessarily appropriate. Specific requirements and restrictions that can either help or hinder the development of a site. Policy wording should acknowledge this and allow for flexibility on a case by case basis.
Paragraph 31 of the recent National Planning Policy Framework (NPPF) acknowledges that all policies should be underpinned by relevant and up-to-date evidence, but, goes on to note that policies should take into account market signals. Paragraph 33 highlights that reviews of the local plan should take into account changing in circumstances affecting the area. Therefore, policies should be flexible enough to adapt to changes in the market in the short to medium term. If policies are too inflexible, it could constrain the delivery of housing.

In summary, the wording for policies HS1, HS4 and HS5 should be flexible enough to ensure that the required housing can be delivered within the plan period.

We trust our comments will be taken into consideration and the policy wording will be amended accordingly. If you require any further information, please do not hesitate to contact me.

Yours faithfully

Victoria Chase

cc: Mr O Taylor
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1.1 HSG15 identified land control

2.0 The Site and its existing context
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4.3 Illustrative concept scheme
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4.7 Sustainable Drainage System
4.8 Building Massing and Disposition

5.0 Conclusion
5.1 Impressions of the site layout
1.0 Introduction

This document has been prepared on behalf of Charterhouse Strategic Land ("Charterhouse") to assist the promotion of the Greenacres Leisure Centre, Limpsfield Road, Warlingham site ("the Site") which is proposed for release from the Green Belt and allocation for residential development as part of the submitted Tandridge District Local Plan: 2033 - allocation HSG15: Land west of Limpsfield Road, Warlingham.

Charterhouse’s objective is to secure the site’s allocation for housing so that a new sustainable and high quality residential development is delivered to cater for Tandridge’s objectively assessed housing need. Accordingly, this document briefly summarises the baseline site conditions and presents a concept proposal which capitalises on the unique character of the site and demonstrates its potential to meet local housing needs as set out in the draft HSG15 design requirements.
1.1 HSG15 identified land control

The land controlled by Charterhouse forms part of the submitted allocation HSG15 and is approximately 63% of the overall allocation.

Heavy line indicates the settlement boundary between Warlingham the adjoining green belt.

The red line indicates the site boundary of HSG 15. The Local Plan describes the total site area as 10.9 ha.

Blue shading indicates Cala Homes site allocation measured at 3.93 ha. Equivalent to 37% of total HSG 15 site allocation.

Yellow shading indicates Charterhouse site measured at 6.64 ha. Equivalent to 63% of total HSG 15 site allocation.
2.0 The Site and its existing context

2.1 Geography and location

Warlingham is situated in the north of Tandridge District, close to the shared district boundary with the London Borough of Croydon.
2.0 The Site and its existing context

The Site is located to the north of Warlingham lying immediately to the west of the B269 (Limpsfield Road) and to the north of the existing Shelton Avenue residential estate.
2.0 The Site and its existing context

The Site’s boundaries are presently marked to the north, east, south and west by a 1.8 metre chain-link fence. Abutting and running parallel to the Site’s northern boundary is ‘Bridleway 88’ which links Limpsfield Road with Tithepit Shaw Lane. Abutting and running parallel to the Site’s western boundary is ‘Footpath 110’ which links Shelton Avenue with Tithepit Shaw Lane.
2.0 The Site and its existing context

2.2 Access

The Site is currently accessed via a bellmouth junction onto the B269 (Limpsfield Road). The access is gated but is generally left open during the day. The width of the access at the edge of the carriageway measures approximately 8.5m, whilst the internal access road measures approximately 5.8m in width.

2.3 Connectivity

The site is located a few minutes’ walk from the centre of Warlingham. The site benefits from good proximity to a number of key transport routes and access to public transport, while pedestrian footways are provided along both sides of Limpsfield Road providing a continuous pedestrian route towards local amenities. The footways are of an appropriate standard with regular street lighting, tactile paving and dropped kerbs where appropriate. The roads and footways in the surrounding area have gentle gradients, facilitating active modes of travel. Further, several pedestrian refuge islands are in place to facilitate the safe movement of pedestrians across Limpsfield Road.
2.0 The Site and its existing context

2.4 Historical and current use

Historical OS maps from the mid 19th Century describe the Site as a Brick Field and Old Quarry. The maps indicate kilns, a weighbridge and a quarry.

Today, the southern half of the Site together with the on-site built structures and hardstanding is occupied by Greenacres (Warlingham) Limited, whilst the northern half of the Site is currently under-utilised and vacant land.

The southern part of the Site is laid out with a number of grass playing pitches which the Tandridge District Council Playing Pitch Assessment (“PPA”), dated June 2018, defines as 2 x adult football and 2 x youth football pitches. The built structures on-site comprise a poor quality clubhouse with a derelict swimming pool, 3 x netball courts, and an all-weather multi use games area. Attached to the clubhouse is a changing facility which is described by the PPA as being of poor quality. The quality of the existing facility is considered to be the most significant contributing factor to the site being under-used by the local community.
2.0  The Site and its existing context

2.5  Topography

The site falls evenly from the southern boundary towards the northern boundary, with a local difference of 4 metres. The contours show disturbance to the northern half of the Site, most probably due to the historic land-use.

Yellow contour line shows the low point of the site at 176.54 m AOD

Orange contour line shows the high point of the site at 182.00 m AOD
2.0 The Site and its existing context

2.6 Trees and vegetation
Trees and hedges of varying qualities line all four of the Site's boundaries, and a Tree Protection Order ("TPO") applies to 4 trees on the western Site boundary and the trees running through the middle of the site and down the eastern boundary of the southern half of the Site.

2.7 Landscape Character
According to the Surrey Landscape Character Assessment, published in April 2015, the Site does not lie within a defined Landscape Character Area or Type, but rather within an area shared with urban centres. Accordingly, the Council does not hold a recorded landscape baseline for the Site. Notwithstanding, it is considered that the key landscape characteristics of the Site are:

i) The mature native trees scattered along the boundaries and within the central area. In particular, the mature broadleaf trees covered by the TPO on the eastern boundary are distinctive and distinguishing to the Site landscape character. They provide for a strong green infrastructure and enclosure to Limpsfield Road. These trees contribute to the overall perception of a well treed, mature landscape on the edge of the settlement.

ii) The northern and western boundaries are similarly characterised by mature and unmanaged 'gappy' hedgerows with some more mature trees featuring within them.

iii) The interior of the Site is relatively unremarkable, being formal recreation in the southern parcel and disused space in the northern parcel.

In visual terms, the Site benefits from containment provided by an off-site thicket of woodland and internally by dense vegetation along the western boundary. At present, the extent of off-site vegetation also ensures the settlement edge does not exert an urbanising influence on views or the more undeveloped character further west.
2.0 The Site and its existing context

2.8 Heritage

The Site does not contain any designated heritage assets. Further, a review of the setting of surrounding designated heritage assets suggests there is no potential for harm to these assets as a result of changes already within their setting and the fact that the Site does not form part of any designated heritage asset setting.

With regard to non-designated heritage assets, there are no signs of the old Kiln recorded on the mid-19th Century OS map in north east corner of Site, and there are no records of any archaeological sites within or adjacent to the site. Large areas of the northern field have previously been quarried away and backfilled with early/mid 20th Century rubbish. Further areas have been terraced or built over. As such any archaeology previously present in these areas will have been truncated and is unlikely to warrant retention.

2.9 Utilities

An assessment of utilities within the Site and surrounding local area has identified minimal obstacles to the delivery of housing. Minor and temporary disconnections are likely, but no diversions are reasonably anticipated. The assessment has identified the presence of a High-Pressure gas main on the Site’s northern boundary which will need to be accommodated within any future scheme.
3.0 Allocation HSG15 design requirements

The draft policy contained within the submitted Local Plan: 2033 requires the Site to:

i) Conserve and enhance the setting of the Grade II* listed All Saints Church to the east of the Site;

ii) Provide sensitive landscaping reflective of the site’s edge of settlement;

iii) Provide for local amenity green space;

iv) Ensure that the existing woodland edges to the Site are retained and protected with appropriate unlit habitat buffer;

v) The proposed design and layout should actively seek to create and preserve a clear and defensible boundary between the edge of the Site and the Green Belt

vi) Re-provide for the loss of playing pitches.

Further, the draft policy requires the allocation to provide for the relocation and expansion of Warlingham Primary School, however, due to the extent of Charterhouse’s unresolved objection to this element of the draft policy the emerging concept masterplan proposals do not make provision for the school.
4.0 Concept design

4.1 Vision

The vision for the Site is to create a sustainable new living environment, based around a fully integrated new community with new homes that are accessible to everyone. An inclusive place which makes everyone feel comfortable, safe and secure; a place where people want to live, which promotes an active lifestyle and sense of wellbeing; a place that future residents are proud to call home. To achieve this, the Site will:

i) Provide ready access to essential facilities including open space, leisure, landscape and amenity areas;

ii) Deliver a wide range of choice of new, sustainable, high quality housing, including affordable housing;

iii) Focus on establishing a strong sense of community, with accessibility to jobs and community facilities;

iv) Deliver a sustainable, landscape and environmentally design led scheme, which is based on the key objectives of good placemaking:

a. Positive identity to ensure that the new development responds to the site and contextual opportunities, so fully integrating with its surroundings and defining new spaces

b. Viable and sustainable place, which is deliverable in the long term and contributes in a positive way to the environmental, social and economic viability of the area

c. A connected place which links and integrates with its immediate surroundings and the wider area

d. A welcoming place which, through high quality design fosters a strong sense of place which maximises a sustainable way of life for the community and minimises the need to travel

e. Delivering best practice and innovation by utilising new technologies and ideas that will reduce energy demands and ensure that the environmental effects of the proposal are minimised

f. Quality homes for a wide range of local needs, space to live and play, good access to facilities, public transport and a place which people can be proud of;

g. A sustainable landscape, incorporating green corridors and space around the existing landscape features to promote biodiversity and ecology.
4.0 Concept design

4.2 Developing the concept

The concept diagrams build on the existing characteristics of the Site and begin to illustrate how the design requirements of draft allocation HSG15 can combine with the vision for the Site, demonstrating how the key principles and structure of a landscape and environmentally led masterplan can be delivered.

The concept starts from the premise of access and connectivity, utilising the existing access from the B269 (Limpfield Road). A secondary ‘emergency’ access is proposed from a disused access out onto the Bridleway. The network of green infrastructure along to the Site boundaries and through the middle of the site is proposed to be retained and enhanced, creating a strong landscape setting.

Within the site, circulation will be achieved from the main access route into the site by ‘forking’ to either side of a retained and enhanced green axis and from the main distributor road-ways, running north to south adjacent to the areas for surface water attenuation. This supports the creation of a circulation spine which will act as an orientation feature.

Housing will front onto the boundaries of the Site to ensure a good level of natural surveillance over shared spaces, areas of public open space and footpaths through the site. Contiguous multifunctional green spaces are a key component of the concept design and run along the western, northern and eastern boundaries. Further, the western and eastern Site boundary is connected through the middle of the Site. Accordingly, the design concept addresses the draft allocation requirements for sensitive landscaping; local amenity green space; retention of existing trees and the woodland edges; and the opportunity for a clear and defensible future Green Belt boundary to the western edge of the Site.

The use of shared driveways will be incorporated within the concept so that contrasting material are introduced helping to generate alternative street characters. All routes into and through the Site are to be designed to promote a pedestrian friendly environment by adopting a variety of surfacing.
4.0 Concept design

4.3 Illustrative concept scheme

- Distribution road (Tarmac)
- Pedestrian priority surface
- Shared private Driveway
- Emergency Vehicles Access
- Speed reduction junction
- Footpath
- Proposed Cycle Route
- Wildlife Pond
- Outdoor Amenity Space
- Area of ecological enhancement
- 3G Sports Pitch
- Play Area
- Existing Bus Stop
- Electricity Substation
- Main Site Access
4.0 Concept design

4.4 North Boundary

Each of the boundaries to the site offers a different challenge and opportunity.

This edge of the site is bounded by the bridleway, beneath which is a 300mm diameter drain and a high pressure gas main. The latter is the subject of an easement which prohibits building within 3m on either side of the pipe.

The combination of bridleway status and the easements allow for an opportunity to create an open aspect to this edge of the site, with an opportunity for the new dwellings to face onto the path, which will contribute to animating this major pathway and provide casual overlooking which will enhance the sense of safety and security for those who use it.

The proposed Care Home sited in the north east corner of the site may be two to three stories high, in line with the proposal for the Limpsfield Road boundary, and will also benefit from a frontage facing the bridleway, which offers a quieter more open aspect.
4.0 Concept design

4.5 West Boundary

The western edge of the site is defined by the existing footpath linking the bridleway to Shelton Avenue, which in turn leads to Warlingham village.

The present footpath is overgrown and almost impassable in places. The scheme offers an opportunity to enhance this footpath and develop a cycle route to connect Warlingham with the footpath down to Upper Warlingham Station.

The adjacent green belt offers opportunities, and also places particular requirements on the activities along this boundary. There is a clear requirement to maintain a green buffer, free from bright artificial lighting, to provide wildlife habitat. This footpath is popular with walkers and for exercising dogs, but is largely screened and lacks the security of informal supervision which would come from being overlooked. Rather than back the gardens of the new houses onto the footpath, creating a narrow alleyway, we can lay out the houses to face onto the footpath.

The footpath will benefit from opening out in width, and by fronting it with houses, will benefit from informal supervision. Low height bollard lighting would support the ecological requirement to avoid bright lighting, which is a particular problem for bats.
4.0 Concept design

4.6 East Boundary

The eastern edge of the site is characterised by the change in level to the pavement of Limpsfield Road, which is typically 1.5m lower than the site, with an earth embankment at the transition. The belt of protected trees on top of the bank will be retained and supplemented.

The embankment is a significant factor in locating the points of entry to the site, and the existing access will be retained.

To mitigate the loss of open green space which is currently provided by the playing fields, the Local Plan requires provision of a ‘green margin’ along this boundary, to be available as public amenity space. This edge of the site will be developed with additional trees and landscaping, incorporating footpaths and resting points, to form a linear park elevated above the road, with access from pavement level via steps and ramps. The route along the linear park will expand into the open space around the 3G pitch, near to the site entrance.
4.0 Concept design

4.7 Sustainable Drainage System

Investigations will be required to establish the infiltration rate of the ground, and the infrastructure requirements for surface water management. The former use of the site as brickworks suggest that the substratum is clay, and we may assume that the infiltration rate will be poor. This implies that in rainy conditions, the surface water will not be able to soak away readily, and holding ponds and swales will be required to manage the disposal of storm water. These can be attractive elements in the scheme, and will be incorporated into the layouts to contribute aesthetically as well as functionally.

The existing low area on the west boundary of the site apparently serves this purpose at present, receiving an outfall pipe which is assumed to be a surface water drain from the vicinity of the existing clubhouse buildings. This will be acknowledged and incorporated into the overall SuDS design.

The central spine of the site provides a convenient route for a continuous drainage swale, running from the highest part of the site at the south end, to the lowest point on the north boundary where it will discharge into a holding pond.

The surface water run-off will collect via below-ground pipework to discharge into the swale, which will fall the length of the site in a series of cascades.
4.0 Concept design

4.8 Building massing and disposition

Existing buildings along Limpsfield Road are a mixture of two and three storeys high. Older houses are typically two storey detached and semi-detached, and opposite the site there are recent three storey high developments of flats. It is proposed that the development of this site should reflect this precedent.

The eastern boundary on Limpsfield Road offers an opportunity for three storey buildings. The existing development on the opposite (eastern) side of the road appears historically to have been two storey houses, but recent developments opposite the southern part of this site have been 2½ - 3 stories high, and could reasonably be matched with equivalent height buildings on the west side of the road.

These buildings will benefit from an outlook over the linear park; this could be particularly advantageous for flats, having limited external amenity space. The houses and flats along this boundary will also contribute informal supervision of the public space.

The planning policy proposes that development on the western boundary should mediate between the green belt and the site. The proposal to open up the space along the footpath on this boundary offers the prospect views over the greenbelt, and 2½ storey houses could take advantage of this. The belt of trees will mitigate the potential impact on the distant views onto the site.

The northern boundary, defined by the bridleway, has a patchy screen of trees and bushes, few of which are substantial enough to warrant keeping. Because the easements related to the gas main define a clear zone 6m wide along the bridleway, this is potentially the most open side of the site.

As part of the proposition to animate and enhance this route, there is an opportunity to mix a variety of two and three-storey buildings. The southern end of the site is approximately 5m lower than the northern boundary, which would mitigate the effect of additional height on distant views.

It would be beneficial to collaborate with the adjoining developer, CALA Homes, to achieve a coherent design approach along both sides of this route.
This document has been prepared to illustrate an emerging design concept for the Site capable of satisfying the draft HSG15 design requirements, with the exception of the Primary School.

The illustrative concept scheme provides an initial vision of how the Site could be developed having regard to the issues, opportunities and design principles within this document.

The proposal will deliver a sustainable scheme, creating a high quality place of an appropriate density and scale. The future built form will adopt key urban design principles to ensure that the future community will have a high quality environment to live and play which includes quality design, open space and a mix of housing tenures available to all members of the community.

The illustrative design concept is capable of delivering up to 150 new dwellings, a 90 bed care home and the re-provision of the playing pitches through the delivery of a new all-weather 3G playing surface.
5.0  Conclusion

5.1 Impressions of the site layout
5.2 Impressions of the site layouts
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