TANDRIDGE DISTRICT OUR LOCAL PLAN: 2033
EXAMINATION IN PUBLIC

HEARING STATEMENT

MATTER 2:
THE PROVISION OF HOUSING

LAND WEST OF GODSTONE (SITE HSG11)

ON BEHALF OF M&G REAL ESTATE

Prepared by: Peter Atkin MRTPI
1. INTRODUCTION

1.1 This Hearing Statement has been prepared by Pegasus Group on behalf of M&G Real Estate, the freehold owner of Land West of Godstone, proposed for residential allocation under Policy HSG11 within the Tandridge District Council (TDC) ‘Our Local Plan: 2033’, (July 2018 and January 2019 versions), hereafter referred to as ‘the Plan’, and is provided in response to the Inspector’s Matter 2 (The Provision of Housing) and associated issues and questions raised.

1.2 M&G Real Estate’s overall position in respect of the Plan is one of ‘in principle support’, subject to proposed minor amendments as set out within this Statement.
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 Question 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?

2.2 No comment.
2.3 Question 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?

2.4 No comment.
2.5 **Question 2.3: Is the 20% Market Signals adjustment justified?**

2.6 Yes. The 20% Market Signal adjustment is supported as a **minimum** requirement.
2.7 **Question 2.4: Is the approach to defining affordable housing needs justified?**

2.8 It is considered that any assessment of TDC’s affordable housing need should also consider the implications of 'Right to Buy' and the subsequent effects on the delivery of net new affordable homes compared to net losses as a result of the Central Government Policy.
2.9  **Question 2.5:** Are the assumptions made in respect of employment growth realistic?

2.10  No comment.
2.11 **Question 2.6:** Are there other relevant factors to be taken into account in calculating the OAN?

2.12 No comment.
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)?

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

2.14 M&G Real Estate consider the potential development capacity of site HSG11 to be greater than currently envisaged by the Plan.

2.15 The Plan proposes to allocate site HSG11 for 150 homes, however as illustrated by the enclosed Testing Layout (Appendix 1), the site is demonstrated to have capacity to deliver up to 250 new homes.

2.16 The Testing Layout is informed by a comprehensive review of the site’s constraints and opportunities, as assessed throughout our Representations submitted to the Regulation 18 and Regulation 19 consultations\(^1\) and follows a robust landscape-led approach as demonstrated within the enclosed Landscape Statement (Appendix 2\(^2\)) to ensure the proposals for up to 250 homes are of the highest design quality and sit comfortably within their surroundings, having regard to relevant emerging development management policies contained within the Plan.

2.17 As such, site HSG11 is capable of contributing further towards meeting TDC’s OAN than currently envisaged by the Plan, thereby helping to reduce pressure on bringing forward additional and/or less suitable sites.

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\(^1\) Main Submission Document MD14 – M&G Real Estate Regulation 19 Representations

\(^2\) See Appendix 4 (‘Indicative Landscape Strategy’) of enclosed Landscape Statement
2.18 **Question 2.8: Have all realistic options for meeting the OAN within Tandridge in full been exhausted?**

2.19 It is considered that all options for meeting TDC’s OAN have not been exhausted.

2.20 M&G Real Estate consider site HSG11 capable of delivering up to 250 homes, not 150 homes as currently proposed.

2.21 Please refer to our response to Question 2.7 above for further details.
2.22 **Question 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?

2.23 As highlighted within our Representations to the Regulation 19 consultation\(^3\), TDC should carefully consider the significant social costs associated with not meeting objectively assessed needs, which is likely to increase pressure on TDC to find affordable housing opportunities for **all** sections of the community, whilst also making it harder for local businesses to find and retain employees. Accordingly, a lack of housing choice has the potential to create/perpetuate real negative social and economic consequences.

2.24 M&G Real Estate consider site HSG11 capable of delivering up to 250 homes, not 150 homes as currently proposed within the Plan.

2.25 Please refer to our response to Question 2.7 above for further details.

2.26 The enclosed Testing Layout (Appendix 1) demonstrates that the proposals for up to 250 new homes are of the highest design quality and sit comfortably within their surroundings, having regard to other relevant emerging development management policies contained within the Plan, including with regard to affordable housing provision and housing mix in line with identified local needs.

2.27 As such, site HSG11 is capable of contributing further towards meeting TDC’s OAN than currently envisaged by the Plan and helping to deliver a wide choice of high-quality homes, widening opportunities for home ownership and to create sustainable, inclusive and mixed community that meet the needs of different groups in the community.

\(^3\) Main Submission Document MD14 – M&G Real Estate Regulation 19 Representations - Appendix 3 (Reg 18 Sites Representations – Page 5, Paragraph 2.6)
2.28 **Question 2.10:** Would and/or where would any unmet housing need arising in the Tandridge HMA during the Plan period be met?

2.29 M&G Real Estate consider the potential development capacity of site HSG11 to be greater than currently envisaged by the Plan, being capable of delivering up to 250 homes, not 150 homes as currently proposed.

2.30 Please refer to our response to Question 2.7 for further details.
C: The Overall Supply of Housing

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

2.31  Question 2.11: Does the housing trajectory set out in the Plan provide a sound basis for meeting the identified housing need?

2.32  M&G Real Estate consider the potential development capacity of site HSG11 to be greater than currently envisaged by the Plan, being capable of delivering up to 250 homes, not 150 homes as currently proposed.

2.33  Please refer to our response to Question 2.7 for further details.

2.34  Moreover, it is considered that the draft policy HSG11 requirement to link the delivery of site HSG11 to the delivery of a new health hub within the South Godstone Garden Community is entirely unreasonable and has the effect of unnecessarily delaying the delivery of a key sustainable and deliverable site, as demonstrated throughout our Representations submitted to the Regulation 18 and Regulation 19 consultations⁴, which is capable of delivering up to 250 new homes in the early part of the Plan period to help address TDC’s acute housing needs when they are most needed – now.

Proposed Amendments to the Plan:

2.35  Accordingly, the following minor amendment to the Plan is proposed:

- Housing Trajectory (Appendix 1 of the Plan):
  - To be updated to reflect site HSG11 phasing as proposed by M&G Real Estate within the enclosed ‘Statement of Delivery’ (December 2018) (Appendix 3).

⁴ Main Submission Document MD14 – M&G Real Estate Regulation 19 Representations
Question 2.12: Is the housing trajectory realistic and deliverable and are there any threats to delivery?

M&G Real Estate consider the potential development capacity of site HSG11 to be greater than currently envisaged by the Plan, being capable of delivering up to 250 homes, not 150 homes as currently proposed.

Moreover, as demonstrated within our Representations⁵, site HSG11 is considered to be deliverable within the early part of the Plan period.

Please refer to our response to Question 2.11 for further details.

⁵ Main Submission Document MD14 – M&G Real Estate Regulation 19 Representations
2.40 Question 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?

2.41 No comment.
2.42 Question 2.14: Is it justified that HSG20; North Tandridge: One Public Estate (NTOPE), Caterham is included in the housing trajectory?

2.43 No comment.
2.44 **Question 2.15:** In broad terms, is the housing development proposed in the Plan and set out in the trajectory based on sound understanding and robust evidence of viability?

2.45 M&G Real Estate consider the potential development capacity of site HSG11 to be greater than currently envisaged by the Plan.

2.46 Please refer to our response to Question 2.11 and Question 2.12 for further details.
2.47 Question 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?

2.48 Yes – it is considered that it would be effective to include within the Plan a Policy committing TDC to a review of the Plan if the AAP for the South Godstone Garden Community is not adopted by a specified date in order to sustain the supply of housing.

2.49 Please refer to our response to Question 2.11 for further details.
**D: Five Year Housing Land Supply**

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

2.50 **Question 2.17:** Will the Plan provide for a five-year supply of deliverable housing sites on adoption?

2.51 M&G Real Estate consider the potential development capacity of site HSG11 to be greater than currently envisaged by the Plan, being capable of delivering up to 250 homes, not 150 homes as currently proposed.

2.52 The enclosed Statement of Delivery (Appendix 3) indicates that up to 125 homes are deliverable at site HSG11 within the 5-year period.

2.53 Please refer to our response to Question 2.11 and Question 2.12 for further details.
2.54 **Question 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?

2.55 As summarised in Table 1 below, whilst TDC appears able to demonstrate an over-supply of housing against adopted Core Strategy (2008) targets in the period 2013/2014 - 2017/2018, it is evident that TDC is currently under-delivering in the same period against the proposed housing target of 303 homes per annum and against the OAN of 470 homes per annum.

**Table 1: Summary of Housing Delivery in TDC against Housing Targets in the Period 2013/2014 – 2017/2018**

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<td>256</td>
<td>125</td>
<td>303</td>
<td>470</td>
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<td>125</td>
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<td>470</td>
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<tr>
<td>2017/18</td>
<td>332</td>
<td>125</td>
<td>303</td>
<td>470</td>
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<tr>
<td><strong>TOTAL</strong></td>
<td><strong>1,280</strong></td>
<td><strong>625</strong></td>
<td><strong>1,515</strong></td>
<td><strong>2,350</strong></td>
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</tbody>
</table>

*Source: TDC Annual Monitoring Report (2018)*

2.56 Careful consideration is therefore required as to whether, in this context, it is appropriate to apply a 5% or 20% buffer to the calculation of TDC’s five-year housing land supply, as required by national planning policy (NPPF, paragraph 47).
2.57 Question 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?

2.58 No comment.
**E: Affordable Housing Requirement**

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

2.59 **Question 2.20:** Does the SHMA’s approach to calculating affordable housing need, comply with the stages set out in the Planning Practice Guidance?

2.60 It is considered that any assessment of TDC’s affordable housing need should also consider the implications of ‘Right to Buy’ and the subsequent effects on the delivery of net new affordable homes compared to net losses as a result of the Central Government Policy.
2.61 **Question 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?

2.62 M&G Real Estate consider the potential development capacity of site HSG11 to be greater than currently envisaged by the Plan, being capable of delivering up to 250 homes, not 150 homes as currently proposed.

2.63 Please refer to our response to Question 2.7 and Question 2.9 for further details.

2.64 The enclosed Freedom of Information (FOI) requests at Appendix 4 highlight that as of July 2019, TDC currently has a total of 1,611 applicants on housing waiting lists (up from 1,233 in December 2016) and of these, there are currently 113 Godstone applicants on the housing waiting lists (up from 42 applicants in December 2016). The development of the site for up to 250 new homes, comprising up to 150 market (60%) and 100 affordable (40%), would therefore almost completely address Godstone village’s own affordable housing needs and therefore represents a significant opportunity to deliver real social benefits directly to the community of Godstone.
2.65 **Question 2.22: Are the proposed Modifications to Policy TLP12 necessary for soundness?**

2.66 No comment.

(Matter 2 Response Word Count: 1,349)
APPENDIX 1

TESTING LAYOUT
APPENDIX 2

LANDSCAPE STATEMENT
SUPPORTING LANDSCAPE STATEMENT

LAND WEST OF GODSTONE

ON BEHALF OF
M&G REAL ESTATE
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APPENDICES

Appendix 1: Viewpoint Locations and Landscape Designations plan;

Appendix 2: Summer Photographs from Viewpoints 1 to 10;

Appendix 3: Winter Photographs from Viewpoints 1 to 10; and,

Appendix 4: Indicative Landscape Strategy;

Appendix 5: Testing Layout;

Appendix 6: Extract from Tandridge District Council’s Green Belt Assessment (Part 3): Appendix 1 (2018), in relation to GOD 010; and,

Appendix 7: Extract from Tandridge Landscape Capacity and Sensitivity Study (October 2016), in relation to Site GOD010.
1. **INTRODUCTION**

1.1 This Landscape Statement has been prepared by Pegasus Group on behalf of the M&G Real Estate in respect of land to the west of Godstone, Surrey (‘the Site’).

1.2 With reference to **Viewpoint Locations and Landscape Designations at Appendix 1**, the Site comprises a field currently sown to grass immediately adjacent to the north-western edge of the settlement of Godstone. The Site benefits from strong visual and physical containment on all sides, provided by established and/or maturing woodland blocks and housing within Godstone. To the north and west of the Site the enclosure is further strengthened by the embanked and well vegetated haul road corridor leading to the North Park Quarry, which is located further to the west of Godstone. The ‘East Reservoir’ lies immediately adjacent to the woodland belt along the southern edge of the Site.

1.3 This Landscape Statement provides supporting evidence with regard to landscape and visual matters in relation to the potential of the Site for residential development, in the context of the Tandridge District Council’s ‘Our Local Plan: 2033 (Regulation 22 submission) January 2019’.

1.4 The main objectives of the Landscape Statement are as follows:

- To assess the current landscape characteristics and quality of the Site and its surroundings, and their function within the landscape;
- To assess the nature and quality of existing views of the Site from the surrounding area;
- To review the contribution of the existing site towards the purposes of the Green Belt, as stated in Paragraph 80 of the National Planning Policy Framework (NPPF);
- To consider the capacity of the Site to accommodate residential development.

1.5 An initial desk top study was carried out to review a range of published information concerning the Site, including planning policy of relevance to landscape and visual matters, published landscape character assessments, landscape designations and publications from Tandridge District Council. Visits to the Site and the surrounding area were carried out in November 2016 and July 2019 to verify the findings of the desk-based review and to determine the extent of the visual influence of the Site.
1.6 The following illustrative and other material supports this report:

- Appendix 1: Viewpoint Locations and Landscape Designations plan;
- Appendix 2: Summer Photographs from Viewpoints 1 to 10;
- Appendix 3: Winter Photographs from Viewpoints 1 to 10; and,
- Appendix 4: Indicative Landscape Strategy;
- Appendix 5: Testing Layout
- Appendix 6: Extract from Tandridge District Council’s Green Belt Assessment (Part 3): Appendix 1 (2018), in relation to GOD 010; and,
- Appendix 7: Extract from Tandridge Landscape Capacity and Sensitivity Study (October 2016), in relation to Site GOD010.
2. RELEVANT POLICY AND GUIDANCE


2.1 The National Planning Policy Framework (NPPF) was first published in 2012. It was most recently updated in February 2019. However, at paragraph 214, it included a transitional arrangement which allows for the 2012 version of the NPPF to continue to be used for the purpose of examining plans which had previously been submitted. For that reason, this Landscape Supporting Statement primarily makes reference to the 2012 version of the NPPF. All references to the NPPF within this document are to the 2012 version, unless otherwise specified.

2.2 It is noted that the 2019 version of the NPPF maintains the same broad requirements of the 2012 NPPF in relation to delivering good design, protecting Green Belt Land, and conserving and enhancing the natural environment.

2.3 The 2012 NPPF identifies a presumption in favour of sustainable development, which is defined as “meeting the needs of the present without compromising the ability of future generations to meet their own needs”. Development should be in accordance with the relevant up-to-date Local Plan, as well as policies set out in the NPPF.

2.4 The NPPF states that “The purpose of the planning system is to contribute to the achievement of sustainable development” and that there are “three dimensions to sustainable development: economic, social and environmental”. The environmental role is described as “converting to protecting and enhancing our natural, built and historic environment; and as part of this, helping to improve biodiversity, use of natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy”.

2.5 The NPPF sets out Twelve Core Planning Principles, of which the following are of relevance to landscape and visual matters. Planning should:

- “always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings;

- take account of the different roles and character of different areas, promoting the vitality of our main urban areas, protecting the Green Belts around them, recognising the intrinsic character
and beauty of the countryside and supporting thriving rural communities within it;

- contribute to conserving and enhancing the natural environment and reducing pollution. Allocations of land for development should prefer land of lesser environmental value, where consistent with other policies in this Framework; and

- conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations.”

2.6 Section 7 of the NPPF sets out guidance in relation to the delivery of good design. The NPPF requires that development responds to local character, is visually attractive, and is integrated into the natural environment. Paragraph 58 of the NPPF states that planning policies and decisions should aim to ensure that developments:

- “will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;

- establish a strong sense of place, using streetscapes and buildings to create attractive and comfortable places to live, work and visit;

- optimise the potential of the site to accommodate development, create and sustain an appropriate mix of uses (including incorporation of green and other public space as part of developments) and support local facilities and transport networks;

- respond to local character and history and reflect the identity of local surroundings and materials, while not preventing or discouraging appropriate innovation;

- create safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion; and

- are visually attractive as a result of good architecture and appropriate landscaping”.

2.7 With regard to the fourth bullet point above, it is noted that the 2019 NPPF includes this requirement and extends it by including reference to “...not preventing or discouraging appropriate innovation or change (such as increased densities).” (NPPF 2019 paragraph 127, point c – underling is this author’s emphasis).

2.8 Paragraph 61 of the NPPF states that:

“...planning policies and decisions should address the connections between people and places and the integration of new development into the natural, built and historic environment.”
2.9 With regard to defined Green Belts, Paragraph 81 of the NPPF provides advice to local planning authorities to plan positively to:

“...enhance the beneficial use of the Green Belt, 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....”

2.10 Paragraph 87 of the NPPF reinforces that development within the Green Belt should be appropriate, stating:

"As with previous Green Belt Policy, inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances."

2.11 Paragraph 88 provides additional emphasis, stating that when considering planning applications:

"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, is clearly outweighed by other considerations."

2.12 Paragraph 83 considers the potential for alterations of Green Belt boundaries, stating:

"Local planning authorities with Green Belts in their area should establish Green Belt boundaries in their Local Plans which set the framework for Green Belt and settlement policy. Once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. At that time, authorities should consider the Green Belt boundaries having regard to their permanence in the long term, so that they should be capable of enduring beyond the plan period."

2.13 Paragraph 85 supports this aim and states that, with regard to defining boundaries, that local planning authorities should “satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period” and to “define boundaries clearly, using physical features that are readily recognisable and likely to be permanent”.

2.14 With regard to the effect of existing villages on the openness of the Green Belt, Paragraph 86 states:

"If it is necessary to prevent development in a village primarily because of the important contribution which the open character of
the village makes to the openness of the Green Belt, the village should be included in the Green Belt.

If, however, the character of the village needs to be protected for other reasons, other means should be used, such as conservation area or normal development management policies, and the village should be excluded from the Green Belt.”

2.15 NPPF Paragraphs 109 - 125 of Section 11 focus on conserving and enhancing the local and natural environment. The NPPF states that the planning system should contribute to and enhance the natural and local environment by “protecting and enhancing valued landscapes, geological conservation interests and soils” and “minimising impacts on biodiversity and providing net gains in biodiversity where possible”.

2.16 NPPF Paragraph 114 notes that local planning authorities should:

“set out a strategic approach in their Local Plans, planning positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure.”

2.17 NPPF Paragraph 115 notes that “Great weight should be given to conserving landscape and scenic beauty in .... Areas of Outstanding Natural Beauty...“.

Local Policy

Tandridge District Core Strategy

2.18 Tandridge District Core Strategy was adopted in October 2008. It provides a range of policies of relevance to landscape and visual matters.

2.19 Policy CSP 20 ‘Areas of Outstanding Natural Beauty’ identifies that the natural beauty of the two AONBs within the District should be conserved and enhanced. In pursuit of this aim the policy identifies a series of principles which should be followed:

“a) conserve and enhance the special landscape character, heritage, distinctiveness and sense of place of the locality;

b) conserve and enhance important viewpoints, protect the setting and safeguard views out of and into the AONB;

c) protect prominent locations on skylines and slopes and for development to take advantage of existing landscape features and tree screening;
d) support suitable located sustainable development necessary to facilitate the environmental, economic and social well being of the AONBs and their communities;

e) promote access to, particularly by means other than the car, recreation within and enjoyment of the area;

f) apply the highest environmental design standards to development."

2.20 The policy also notes that the same principles will be applied to the AGLV which "will be retained for its own sake; as a buffer to the Surrey Hills AONB and to protect views from and into the AONB." It also states that the AGLV designation will be retained until there has been a review of the boundaries of the AONB. The accompanying text to the policy notes that "prominent" new development which would adversely affect the area will be prevented, whilst also noting that there are areas of the district adjacent to existing development which constitute "urban fringe".

2.21 Policy CSP 21 ‘Landscape and Countryside’ states:

"The character and distinctiveness of the District’s landscapes and countryside will be protected for their own sake, new development will be required to conserve and enhance landscape character."

2.22 Policy CSP 18 ‘Character and Design’ requires that new development both within existing built up areas and within the countryside should reflect the character, setting and local context and be of a high standard of design that contributes to local distinctiveness. Development should "have regard to the topography of the Site, important trees or groups of trees and other important features that need to be retained." With regard to the occupiers of neighbouring properties, development must not "significantly harm" their amenities stating a number of potential effects including "overlooking, overshadowing, visual intrusion". The policy also notes that:

"The Council will protect the wooded hillsides in the built-up areas by ensuring that new development does not adversely affect the character of these areas and that there is no overall loss of tree cover.

Within built up areas and villages existing green spaces that contribute to biodiversity, the quality of life, the character or amenities of the area or those that separate built up areas will be protected and where possible enhanced for the benefit of biodiversity and/or recreation."
2.23 Tandridge District Council published the Regulation 22 submission of its draft Local Plan in January 2019. It includes a range of draft policies of relevance to Landscape and Visual matters.

2.24 **Draft Policy TLP30: ‘Green Blue Infrastructure’** states that

> "The existing green and blue infrastructure in the District shall be protected, enhanced and managed for the future benefit of the environment, people and the economy.

> Development will provide a net gain in green infrastructure, which should include suitable biodiversity, which could include biodiversity habitats and wildlife corridors, while seeking to provide a high quality multi-functional green infrastructure network. ..."

2.25 **Draft Policy TLP31: ‘Public Rights of Way’** notes at point III that "Development should, where possible, provide improvements to the public rights of way...“.

2.26 **Draft Policy TLP 32: ‘Landscape Character’** states:

> "...All proposals for development in the District will protect and enhance the key landscape features and visual sensitivities of the landscape character areas identified in the Surrey Landscape Character Assessment 2015 and the Tandridge Landscape Capacity and Sensitivity Assessment 2016-18, or subsequent updates where they apply.

> Proposals will be required to incorporate and implement the landscape guidance set out in the SLCA, 2015, and to:

I. Protect and enhance the character and qualities of the local landscape through appropriate design and management, and

II. Make provision for the retention and enhancement of features of landscape importance, and

III. Protect and where possible, enhance key public views and vistas, and

IV. Protect the landscape setting and contribute to maintaining the individual and distinct character of settlements by preventing coalescence, and

V. Where appropriate, provide landscape mitigation”

2.27 **Draft Policy TLP33: ‘Surrey Hills and High Weald Areas of Outstanding Natural Beauty’** seeks to respect the national level status of the AONBs which are partially
located within the District. Applications for development within an AONB or which has “influence its setting” needs to demonstrate that is:

“...I. has sought to conserve and enhance: the special landscape character, heritage, distinctiveness, sense of place of the locality and where appropriate, relative tranquillity,

II. would safeguard public views out of and into the AONB and not adversely impact skylines and slopes,

III. is designed to take advantage of existing landscape features and tree screening; and

IV. has met the provisions and objectives of the most up-to-date AONB Management Plan for the area.

Major development in the AONB will not be permitted other than in exceptional circumstances and where it can be demonstrated to be in the public interest. ...”

2.28 Draft Policy TLP34: ‘Area of Greater Landscape Value and Area of Outstanding Natural Beauty Candidate Areas’ similarly seeks to retain the AGLV “for its own sake until a review of the Surrey Hills AONB has been completed.” As discussed later in this report, various studies have reviewed the qualities of the land in and around the AGLV with regard to the forthcoming review of the AONB boundaries. Following the review of the AONB boundary, the policy states that “… any land which does not form the new boundary for the Surrey Hills, will no longer hold the AGLV status and applications will be assessed in accordance with Policy TLP32.”

2.29 Draft Policy TLP35: ‘Biodiversity, Ecology and Habitats’ seeks protection of existing natural features and natural habitats as well as a requirement for developments to provide a net gain in biodiversity. With regard to Biodiversity Opportunity Areas (BOAs), the policy states:

“The Council will conserve and enhance biodiversity and seek opportunities for Priority habitat creation and restoration particularly within and adjacent to Biodiversity Opportunity Areas (BOAs). Biodiversity Opportunity Areas are identified on the accompanying Policies Map.

Proposals for development must demonstrate how they will deliver appropriate net gains in biodiversity where possible. Where proposals fall within or adjacent to a BOA, biodiversity measures should support that BOA’s objectives as set out in the BOA-specific Policy Statements prepared by the Surrey Nature Partnership and the policies of the development plan. ...”

2.30 It should be noted that the policy and accompanying text make it clear that the BOA designation does not preclude development. This point is further emphasised
in the 2015 document published by Surrey Nature Partnership ‘Biodiversity Opportunity Areas: the basis for realising Surrey’s ecological network’. The first paragraph of section 1.3 states “...It is important to note however, that this does not preclude development within a BOA: these are primarily spatial planning tools to focus and realise opportunities, not offer further superfluous constraint.”

Draft Policy TLP37: ‘Trees and Soft Landscaping’ identifies the importance of trees and hedgerows to the landscape of the District and notes that the LPA will resist the loss of trees, woodlands and hedgerows which provide significant amenity, ecological or other benefits. New developments should provide space for additional trees and other vegetation and seek opportunities to provide connectivity between wildlife habitats.

Surrey Hills AONB Management Plan 2014-2019

The Surrey Hills AONB Management Plan sets out the policy framework for the AONB. Policies of relevance to landscape and visual issues include Land Use Planning Management Policies LU1 and LU5.

Policy LU1 states:

“In balancing different considerations associated with determining planning applications and development plan land allocations, great weight will be attached to any adverse impact that a development proposal would have on the amenity, landscape and scenic beauty of the AONB.”

Policy LU5 states:

“Development that would spoil the setting of the AONB, by harming public views into or from the AONB, will be resisted.”

The current boundaries of the Surrey Hills AONB will be subject to a forthcoming review by Natural England. This is discussed in more detail in Section 3 of this report.

Tandridge District Council Green Belt Assessment 2015, 2016 and 2018

TDC has carried out a three-staged Green Belt Assessment, with Part 1 published in December 2015, Part 2: Areas for Further Investigation published in October 2016 and Part 3: Exceptional Circumstances and Insetting published in June 2018. The purpose of the Green Belt Assessment is to assess how effectively land
in the Green Belt serves the five purposes of the Green Belt as set out in the NPPF.

2.37 The **Part 1** Assessment contains a Glossary with the following definitions of relevance to Green Belt matters:

"**Coalescence** – The merging or coming together of separate towns and villages to form a single entity;

**Encroachment** – Development in the Green Belt which is not connected to a larger built up area or existing settlement and which post-dates the designation of the Green Belt which came into effect in 1958 and 1974;

**Openness** – Openness refers to the absence of built form;

**Urban Sprawl** – The advancement of uncontrolled, ad hoc, unplanned and sporadic development beyond the clear physical boundary of a settlement.”

2.38 With regard to the settlement of Godstone, the Part 1 Assessment notes that:

"... the Conservation Area is surrounded by development within the settlement, which limits its openness. Openness is also reduced in the immediate locality due to the presence of a considerable amount of built form; this is prominent in the fields to the ... north west.” (Page 30)

2.39 Godstone and parts of the surrounding area, including the Site, are identified as an Area for Further Investigation, Number 017 (AFI 017). The Summary of Reasons notes that:

"...Encroachment is the presence of built form within the Green Belt, and so the town of Godstone itself, as it is not inset, is considered to have a strong encroaching effect. Even though the settlement is not considered to be countryside, it is prominent in the fields to the north west ... of the settlement, where development on multiple sides is particularly noticeable. ...”

2.40 **Part 2** of the Green Belt Assessment was published in October 2016. With regard to AFI 017, it concludes that the area should be considered for further consideration in terms of whether or not it should be inset from the Green Belt i.e. “A village/town that is not included within the designation of Green Belt.”.

2.41 With regard to AFI 017, Appendix 2 of the Part 2 Green Belt Assessment notes that:

“Godstone is a ... large and built up village containing notable levels of development with large proportions of it in depth such
that it is, in parts, semi-urban in character. It is noted that whilst an open area exists at its historic core, this is entirely contained by built form ... Beyond the Defined Village boundaries development is more sporadic and interspersed by fields and makes a contribution to the openness of the surrounding Green Belt.”

2.42 **Part 3** of the Green Belt Assessment was published in June 2018. This part of the assessment included consideration of the 69 potential sites throughout the district, whether they justify exceptional circumstances and thus whether they can be recommended for release from the Green Belt. The assessment concludes that the Site (referred to as GOD 010 - Land west of Godstone) justifies the necessary circumstances to recommend that it is released from the Green Belt.

2.43 The assessment of GOD 010 is set out at Appendix 3 to Part 3 of the Green Belt Assessment and an extract from it is included at Appendix 6 of this Landscape Supporting Statement. In relation to GOD 010, it states:

"...the site is considered, in principle, suitable for development from a landscape and ecology perspective subject to mitigation measures..

The development of this site would result in sprawl, the encroachment on countryside and it would impact upon openness of the Green Belt and as such would impact on the Green Belt purposes. However, the site is visually contained within the vicinity, with a bund and hedging to its west, the treed buffer to the M25 to the north, it is connected to the settlement on two sides with the strong tree line and reservoir to the south effectively halting developable form, and these factors coupled with sensitive design could reduce its impact, whilst the presence of a robust and defensible boundary in the form of the access road/planted bund would ensure the impact on the wider Green Belt’s ability to serve the Green Belt purposes could similarly be reduced. ...

Furthermore, it is considered that subject to appropriate design that relates well to the surrounding landscape and existing settlement, development would make a positive contribution to settlement form. Further that its development could secure public open space provision, which would help mitigate its impact on landscape grounds but which would also provide a wider community benefit. It could also secure enhancements to biodiversity.”

2.44 With regard to the provision of a suitable and permanent boundary that would endure in the long term, the assessment notes that “the temporary quarry access road along the north-western site boundary provides a defensible boundary”.
Tandridge District Council - Sites Consultation (Regulation 18)

2.45 TDC published its Sites Consultation (Regulation 18) report in October 2016. The report identifies the Site as ‘Site GOD 010 – Land to the west of Godstone’ (Site GOD010) and places it within Category 3: Sites outside Areas for Further Investigation. The relevant extract is appended to this Landscape Statement at Appendix 7. The assessment notes that:

"...the landscape evidence indicates that limited development may be accommodated within the wider landscape.... Further evidence is needed before a conclusion on this site can be reached...”. (Page 181)

2.46 Under the heading 'Landscape evidence' it continues:

"This site has a medium capacity to accommodate limited housing development in the wider landscape, provided it is demonstrated that no adverse impacts on the setting of the landscape and settlement would arise.“

2.47 Under the heading 'Ecology evidence' the assessment notes:

"The site is ecologically suitable for development. Development would need to provide buffers for and maintain connectivity to adjoining Ancient Woodland Ecology evidence in Godstone Wood. There are opportunities for development to contribute to ecological networking through extension of the north-south corridor towards the East Reservoir Nature Reserve....”

Tandridge Landscape Capacity and Sensitivity Study

2.48 As part of its evidence base for the emerging Local Plan, TDC published the 'Tandridge Landscape Capacity and Sensitivity Study' (TLCSS) in October 2016. The Study “considers the landscape sensitivity, value and capacity of a number of potential housing sites”, including Godstone: Site GOD010 – i.e. the Site (refer to relevant extract of the TLCSS at Appendix 7). Stage 6: Assessment and Analysis assesses each site on an individual basis across a range of criteria.

2.49 With regard to Godstone, the Study notes:

"Development to the north-west has been restrained, and fields which form GOD010 abut the village to the west. The fields are contained along their western edge by planting on mounding along a quarry pit haul road.”
2.50 It should be noted that, as shown on Godstone Analysis Plan (Area 06) included within the TLCSS, the Site / GOD010 comprises a single field, not “fields” as the TLCSS incorrectly describes.
3. SITE CONTEXT

3.1 The settlement of Godstone lies to the south of Junction 6 of the M25 Motorway within Surrey. The Site is located immediately adjacent to the north-western edge of Godstone within the administrative district of Tandridge District Council (TDC) (see Viewpoint Locations and Landscape Designations at Appendix 1).

3.2 The Site lies within a broadly east-west orientated, valley landscape, known as the Greensand Valley, which is sandwiched between the elevated and wooded Chalk Ridge to the north and the wooded Greensand Hills to the south.

Site Description

3.3 The Site primarily comprises a field currently sown to grass, approximately 10.2 hectares (ha) in size and a small pocket (approximately 0.35 ha) of relatively recently (circa 2005) planted trees and understorey shrubs which is to be largely retained. The field has recently been used for the production of a hay crop, and previously for grazing and arable farming. The narrow northern portion of the Site encompasses a short section of an existing haul road leading to the North Park Quarry, which is located 800m to the south west of the Site. The quarry haul road lies between two vegetated bunds which form a robust physical barrier to the north and west of the Site.

3.4 The Site benefits from strong visual and physical containment on all sides. The Godstone Police Station and Fire Station buildings and associated residential accommodation are located adjacent to the Site’s north-eastern boundary, along with a small area of woodland. The remainder of the Site’s eastern boundary comprises the rear gardens of two storey properties along Tylers Close with the rear gardens typically defined by fencing and / or garden vegetation including non-native conifers and other trees. A belt of semi-mature trees (including Pine, Birch, Sycamore, Oak and Hornbeam) forms the Site’s southern boundary, beyond which lies the ‘East Reservoir Nature Reserve’ and other housing within Godstone (see winter and summer photographs from Viewpoint 2A/2B at Appendices 4 and 5). The western and north-western boundaries of the Site are defined by a tall native species hedge, beyond which lies an elevated bund with maturing woodland (see winter and summer photographs from Viewpoint 1A/1B). This maturing woodland contains forest scale tree species which will grow to a considerable height as they mature further.
Transport Corridors

3.5 As noted above, the Site contains a short length of the haul road which was designed to link the North Park Quarry with the M25, avoiding quarry lorries passing through Godstone. The cul-de-sac of Tylers Close lies the east of the Site.

Topography

3.6 The Site slopes gently from the northwest to the south, with the highest point of the Site adjacent to the boundary hedgerow and maturing woodland planting along the quarry haul road, in the vicinity of the Site’s north-western boundary.

3.7 Beyond the south of the Site, the landform continues to fall within the centre of Godstone, before rising up beyond the opposite side of the valley to form the Greensand Hills to the south of Godstone.

3.8 To the north of the Site, the land continues to rise gently, before rising more steeply towards the narrow east-west aligned Chalk Ridge to the north of the M25.

Vegetation

3.9 The Site largely comprises agricultural land, bounded by a tall hedgerow along its western and north-western boundaries. The Site also includes a small pocket of maturing native-species woodland located between the quarry haul road and the hedgerow towards the north of the Site.

3.10 Beyond the western and north-western boundary hedgerow, maturing woodland has established on the elevated bunds along the quarry haul road, with the tallest trees currently approximately 7.0 to 8.0m tall. The species mix includes Oak, Birch and Field Maple which will grow considerably taller as they mature.

3.11 A band of tall Poplars and a small area of woodland lie to west of the vegetated bunds associated with the haul road. This woodland, which extends southwards from the M25, further separates the Site from the open fields and large-scale buildings of the Orpheus Centre, located along North Park Lane.

3.12 A maturing belt of woodland containing 10 to 12m tall Pine, Hornbeam, Birch and Oak, separates the southern edge of the Site from the substantial water body of the East Reservoir.
3.13 A small area of Ancient Woodland, known as Godstone Wood, lies between the section of quarry haul road within the Site and the Godstone Police and Fire Stations. The Ancient Woodland itself does not form part of the Site. The indicative layout ensures that all proposed development and new infrastructure are substantially separated from the Ancient Woodland by existing and proposed vegetation.

3.14 An outgrown Hawthorn hedge and mature trees are located along the slightly sunken footpath between the north-eastern edge of the Site and the Fire and Police Stations and associated housing.

3.15 The wider landscape, including the Chalk Ridge to the north of the M25 and the Greensand Hills to the south of Godstone, contain substantial areas of mature woodland. The valley landscape between these elevated areas also contains blocks and belts of woodland, but this is more frequently interspersed with agricultural land.

**Public Rights of Way (PRoW)**

3.16 A network of PRoW crosses the landscape around Godstone.

3.17 The North Downs Way passes through the Chalk Ridge to the north of the M25, passing in places along the ridgetop as well as its lower slopes. Within the vicinity of Godstone, much of the length of this promoted PRoW passes through woodland and this limits opportunities for views towards Godstone and the surrounding area.

3.18 A series of footpaths links the Chalk Ridge with the valley to its south, including Footpath 119, which briefly passes adjacent to the Site’s north-eastern boundary. Similarly, there are a series of PRoW linking Godstone and the lower valley slopes to the elevated Greensand Hills to the south of the Site.

3.19 The Greensand Way passes along the south-facing slopes of the Greensand Hills, and intervening topography and vegetation largely prevents views from the PRoW towards Godstone and the surrounding area to the north.

3.20 A permissive path crosses the southern edge of the Site, linking Tyler’s Close to the public right of way to the west of East Reservoir.
Watercourses and waterbodies

3.21 There are no water features identified within the Site.

3.22 The East Reservoir and the associated private diving centre lies to the south of the Site, beyond a belt of maturing woodland. Vehicular access to the diving centre is provided via North Park Lane to the south-west of Godstone.

Landscape and other Designations

3.23 A small proportion of the Site, including the quarry haul road, lies within the Surrey Hills Area of Outstanding Natural Beauty (AONB) and within the Surrey Hills Area of Great Landscape Value (AGLV) (See Viewpoint Locations and Landscape Designations at Appendix 1). It is noted that the AONB boundary illustrated on Local Plan policies map 2019 ‘Green Belt and Landscape Designations’ (Main Submission Document MD11 in the Examination Library) has been amended since earlier documents to show the AONB boundary as defined on Natural England data sets.

3.24 Whilst the boundaries for both the AONB and the AGLV in relation to the Site were first published in 1958, this was before the advent of the M25 motorway and more recently the construction of the quarry haul road and its associated vegetated bunds, which leads from the M25 to North Park Quarry and passes through the northern edge of the Site. It is not obvious on what basis the original boundaries for both the AGLV and the AONB were defined in relation to the area encompassing and surrounding the Site. Certainly, there is no appreciable logic in terms of either current landscape character or land use between the parts of the Site which are included within the AONB and the AGLV and those parts which are excluded, with the boundaries cutting across parts of the open field and the bunded haul road. As discussed in more detail below, various reviews of both the AONB and the AGLV boundaries have not identified any further areas of the Site for inclusion with the actual or proposed expanded boundaries of either designation. It should be noted that the reviews considered additional areas for inclusion within the AONB boundary and did not consider areas for removal from it.

Surrey Hills AONB

3.25 The Surrey Hills AONB covers a quarter of the county of Surrey, extending from Farnham in the west, to Oxted in the east. The boundaries of the AONB were
drawn in 1958 and have not been amended since. In recent years there has been a review of the boundaries of the AONB and the AGLV, with initial proposals drawn up to include additional areas of land from the AGLV within the AONB boundaries – commonly referred to as ‘candidate areas’. It should be noted that none of the candidate areas encompass the Site or other land in its immediate vicinity, although rising land on the Greensand Hills to the south of the Site, beyond the southern edge of Godstone, and also land to the west of North Park Lane to the west of the Site, have been proposed for inclusion. A statement published by Surrey County Council in 2016 has confirmed that the earliest that this evidence would be reviewed by Natural England would be 2018, with public consultations and submission to the Secretary of State typically taking several years to complete thereafter. The statement notes that,

"Until such time as Natural England consider their conclusions on the evidence submitted by Surrey Hills and publish their position, the planning status for the candidate areas remains unchanged. Natural England confirm that no additional planning status or weight can be accrued to these areas as a result of Surrey Hills Board’s request, and that this situation remains unchanged until such time as they publish their recommendations."

**Surrey Hills AGLV**

3.26 The initial boundaries of the Surrey Hills AGLV were first published in 1958, overlapping in places with the boundaries of the Surrey Hills AONB. The boundaries of the AGLV have been subsequently extended to include additional areas following reviews in 1971 and 1981-1984. Neither of these phases of review recommended the inclusion of any additional land within the Site to be included within the AGLV designation. As noted above, the reviews looked for areas of the AGLV which could be included within the AONB boundaries and did not consider areas for removal from the AONB.

3.27 A further round of boundary review, the Surrey AGLV Review, was commissioned by the Surrey Planning Officers Association (SPOA) and was published in 2007. Figure 6.11 AGLV Landscape Character Evaluation: Fieldwork Area 9 identifies areas of existing AGLV which correspond or not to the landscape characteristics of the AONB. This figure also identifies additional areas of land not within the existing boundaries of the AGLV or AONB which should be reviewed due to their “comparable landscape character” with the AGLV. The Site neither lies within land identified as having “identical”, “some shared” or “few or no” characteristics in
comparison with the AONB. Similarly, the Site is not identified as an additional area of land to be reviewed due to its comparable character with the AONB.

3.28 Thus, various rounds of review of the AGLV boundaries carried out in the 1970’s, 1980’s and 2000’s have concluded that the vast majority of the Site which does not lie within either the AGLV or AONB designations does not share the characteristics of either the AONB or the AGLV.

3.29 Notwithstanding the above commentary in relation to the future AONB and AGLV boundaries, only small parts of the Site lies within the current AONB and/or the AGLV. To the north of the Site, the existing quarry haul road lies both within the AONB and the AGLV and will be utilised for the access to the Site. The relatively recent woodland planting, which is also largely within both the AONB and the AGLV boundaries, will be substantially retained and actively managed in line with biodiversity requirements, including the BOA designation.

3.30 Small sections of the central area of the Site lie both within the AONB (1.57ha) and the AGLV (0.52ha). Although their boundaries overlap they are not contiguous. As shown on the Testing Layout at Appendix 5, there will be a relatively small number of houses on the Site which will lie within the AONB boundary, adjacent to existing properties at Tyler’s Close. However, the western side of the Site, a small pocket of which is partly encompassed by the AONB boundary, could include a continuous area of open space providing both amenity and biodiversity benefits, as shown on the Initial Landscape Strategy plan at Appendix 4. Given the proposed balance between open space and potential housing development within the very limited section of the AONB which lies within the central section of the Site, and with regard to footnote 55 of the NPPF, it is not considered that the potential development at the Site would constitute major development in the AONB. As noted above, the various independent reviews of the AONB boundary have concluded that this part of the AONB does not demonstrate characteristics comparable with the AONB, and we would concur with these assessments.

**Metropolitan Green Belt**

3.31 The Metropolitan Green Belt washes over the settlement of Godstone and the whole of the surrounding area.
Godstone Conservation Area

3.32 Godstone Conservation Area is centred around Godstone Green towards the centre of the settlement. It is physically separated from the Site by intervening housing and the East Reservoir and its associated areas of woodland. The photograph from Viewpoint 4, taken from the tumuli at the closest point of the Conservation Area to the Site, illustrates the lack of inter-visibility.

Biodiversity Opportunity Area

3.33 The Site lies adjacent to the north-eastern edge of the Surrey Biodiversity Opportunity Area WG11: Holmesdale. This large-scale BOA extends between Redhill and Godstone, and between the M25 and Bletchingley. The relevant Policy Statement notes priority habitats to be enhanced, along with priority animals and plants species.
4. PUBLISHED LANDSCAPE CHARACTER ASSESSMENTS

Landscape Character Areas of the Surrey Hills AONB

4.1 The Surrey Hills AONB Management Plan identifies a series of landscape character areas across the AONB. However, these have been reviewed and updated as part of a review of the Surrey Landscape Character Assessment which was carried out in 2015. Therefore, the older AONB character areas will not be considered further in this report.

Surrey Landscape Character Assessment: Tandridge District

4.2 The Surrey Landscape Character Assessment (Surrey LCA) was published in 2015 and integrates the various earlier landscape assessments to provide a consistent approach to landscape character assessment across the county.

Landscape Type Greensand Valley

4.3 The Site and the surrounding area lie within the east-west aligned Landscape Type GV: Greensand Valley, which extends across much of the county eastwards from Guildford. Within the vicinity of the Site, the Greensand Valley lies at the southern foot of the ridge scarp slope of the North Downs to the north of the M25. The wooded greensand hills lie to the south of the Landscape Type, to the south of Godstone.

4.4 The Site and the surrounding area lie within the GV4: Merstham to Clacket Lane Greensand Valley landscape character area (GV4 LCA). The key features of GV4 LCA include:

- "Undulating landform, rising up to meet the chalk ridge scarp to the north and wooded greensand hills to the south.

- The predominant land use consists of medium-large scale, open arable fields, but there is a mixture of other uses including, generally smaller pastoral fields, large scale sand quarry workings, golf courses, road and motorway corridors and settlement.

- Blocks of woodland occur across the character area, ... Hedgerows line field boundaries, but are limited in some places with larger arable fields. Smaller parcels of land associated with settlement often have good tree cover. There is ancient woodland, the size and occurrence increasing at the eastern end of the character area.
- Northerly views form the character area include the chalk ridge scarp.

- The M25 motorway runs along the length of the northern edge of the character area. ... A limited number of roads, including the A25 and rural lanes cross the character area.

- A comprehensive network of public rights of way criss-cross every part of the character area...

- The character area includes the village of Godstone and settlements such as Merstham, and wraps around Oxted and Bletchingley. Elsewhere, there are isolated dwellings and farmsteads...

- There are a number of other Conservation Areas, including ... Godstone in the centre of the character area. ...

- Relatively rural landscape, with tranquilly and remoteness varying across the Character Area due to the degree of urban influence from settlement and roads.”

Landscape Type CR: Chalk Ridge

4.5 Landscape Type CR: Chalk Ridge lies to the immediate north of Landscape Type GV: Greensand Valley. Within the vicinity of the Site, the corresponding landscape character area is CR3: Box Hill to Tatsfield Chalk Ridge, which is described as a south facing, narrow scarp slope. The Key Characteristics describe that LCA as “a rural, unsettled, dramatic landscape with peacefulness and tranquility aided by woodland cover” which is “heavily wooded” in places. Wide views towards the greensand hills to the south are available from the scarp but the presence of “larger urban areas [including Godstone] are apparent from a number of vantage points along the chalk scarp” is noted. The North Downs National Trail is noted as running through the character area, alternating between the foot and the top of the scarp. The M25 runs roughly parallel to the chalk scarp and is visually intrusive in some locations.

Landscape Type GW: Wooded Greensand Hills

4.6 The Landscape Type GW: Wooded Greensand Hills occurs in a series of locations across the southern half of Surrey. Within the vicinity of the Site, rising land to the south of Godstone forms Landscape Character Area GW12: Earlswood to Oxted Wooded Greensand Hills. The LCA is described as a predominately wooded, east-west aligned narrow and undulating ridgeline and hills which are a prominent feature in views from the chalk ridge to the north of the intervening vale. Tree cover provides enclosure to parts of the character area, although panoramic
views of the wider landscape are noted from elevated locations where there are gaps in the tree cover. High points along the ridgeline include Tilburstow Hill to the south of Godstone. Most roads are noted as enclosed by tree cover.

**Published Landscape Guidance**

4.7 The Surrey LCA produces Landscape Guidelines for each character type.

**Landscape Type GV: Greensand Valley**

4.8 The Guidelines for Landscape Type GV: Greensand Valley, which encompasses Godstone and the Site, include:

- “Encourage landowners to maintain an appropriate management regime using traditional farming techniques where these will conserve and enhance key landscape features such as the hedgerows and woodlands.
- Encourage consistent management and restocking of hedgerows....
- Promote restoration and traditional management techniques for woodlands and species rich grassland...
- Enhance or link areas of high biodiversity value and positive landscape attributes ...
- Conserve and enhance the open views up to wooded ridge of chalk ridge to the north and greensand hills to the north and south.
- Conserve the historic cores of the villages along the valley floor (such as ... Godstone ...) ...
- Retain the character of the individual settlements avoiding merging these through dense linear development along roads....
- Promote the use of appropriate plant species and boundary treatments at village edges to better integrate development into the adjacent rural character....
- Improve understanding of the general pattern of settlements and their relationship to the landscape and ensure that new development is sympathetic to the wider pattern of settlement....”

**Landscape Type CR: Chalk Ridge**

4.9 The Landscape Evaluation and Guidance for Landscape Type CR: Chalk Ridge identifies the “iconic chalk spine through the county, with panoramic views from
the ridgeline over greensand hills and low weald to the south, including popular, and well known, viewpoints such as ... Gravely Hill.” The associated Landscape Strategy seeks to “Maintain the wide and far ranging views from the many viewpoints along the ridge line... Conserve the open nature of the landscape which forms a backdrop to the surrounding rural areas, and towns and villages that run parallel with the chalk ridge such as ... Godstone ....”

**Landscape Type GW: Wooded Greensand Hills**

4.10 The Landscape Evaluation and Guidance for Landscape Type GW: Wooded Greensand Hills describes the character type as a series of undulating wooded ridges and hills which form the southern backdrop to line of settlements that sit parallel with the chalk scarp of the North Downs. The Wooded Greensand Hills provide a wooded skyline in views from the surrounding landscape. The Landscape Strategy promotes the conservation of the hills “to conserve the remote and relatively unsettled, rural landscape with its varied woodland, areas of open heathland, rural lanes, and views over wider landscape to the south.” In addition, the Strategy aims to ensure key views from locations such as Tilburstow Hill, located to the south of Godstone, are maintained through the appropriate management of woodland. As highlighted within the Landscape Strategy, key views from this Landscape Character Type are southward looking, away from Godstone, and this includes the key publicly available views from Tilburstow Hill.

**Summary of Published Landscape Assessments**

4.11 In summary, the published landscape character assessments describe the largely wooded nature of the elevated Chalk Ridge and the Greensand Hills, which respectively lie to the north and south of the Greensand Valley which contains Godstone and the surrounding area. Godstone is one of a number of settlements which lie along the lower valley slopes. Elsewhere within the undulating valley landscape, there are isolated farmsteads, active quarries and other infrastructure, including the M25 and other transport corridors.

4.12 Views from the Greensand Valley northwards towards the Chalk Ridge are described as a Key Feature of the landscape character area. Views from the elevated Chalk Ridge, across the Greensand Valley, towards the Greensand Hills to the south and the wider landscape beyond are also features described within the landscape character assessments.
4.13 The published landscape guidance for this area aims to promote the enhancement and linking of landscape features such as hedgerows, woodlands and species rich grasslands, whilst seeking biodiversity enhancement. The edge of settlements should be better integrated with the surrounding rural character, whilst the merging of individual settlements through dense linear development along roads should be avoided. Open views to the Greensand Hills and the Chalk Ridge should be conserved and enhanced. New development should be sympathetic to the wider pattern of settlement.
5. **VISUAL APPRAISAL**

5.1 An initial visual appraisal of the Site has been carried out to establish the nature and extent of views of the Site from publicly accessible locations within the surrounding area, including from elevated land within the Surrey Hills AONB to the north, and from elevated sections of the Wooded Greensand Hills to the south. Site visits for this appraisal were carried out in November 2016 and July 2019 to consider both winter and summer views. Summer views are set out at Appendix 2, and winter views at Appendix 3.

5.2 Photographs 1A and 1B from **Viewpoint 1** were taken from the south-eastern corner of the Site illustrating that it substantially comprises a largely featureless field with strongly defined boundaries. The adjoining properties along Tylers Close exert a strong visual influence over the Site. The tall hedgerow around the western edge of the Site physically defines this boundary. The maturing woodland planted on the embankments either side of the quarry haul road, as well as the tall Poplars to the south-west of the Site, add height and depth to provide a substantial physical and visual barrier in both winter and summer months. It should be noted that the height of the maturing woodland planting will increase considerably as the trees reach full maturity. The photographs also illustrate the largely wooded nature of Gravelly Hill and other elevated locations along the Chalk Ridge to the north of the Site.

5.3 Photographs 2A and 2B from **Viewpoint 2** were taken from higher land within the Site, close to its north-western edge. The photographs illustrate the visual influence of the Police and Fire Stations which adjoin the Site’s north-eastern corner. The dense tree belt along the southern edge of the Site, which includes evergreen Pine amongst the mix of forest scale trees, screens the East Reservoir which lies immediately to its south. Views of existing housing on elevated land to the south-west of Godstone are seen against the backdrop of the Greensand Hills to the south of Godstone.

5.4 **Viewpoint 3** is located on the public right of way (PRoW) which runs along the north-eastern edge of the Site. From this location there are clear winter and summer views across the Site to existing housing along Tylers Close. In the vicinity of the Site, the footpath is slightly sunken, compared to the ground level of the Site. Trees and an outgrown hedge line the western side of the footpath with the Site, whilst sections of chain link and close boarded fencing run along its
eastern side with the Fire and Police Stations and the adjoining residential accommodation. The area of maturing woodland adjacent to the haul road to the north of Viewpoint 3 prevents views into the Site from further north along the footpath. Beyond the Site, the footpath crosses the quarry haul road before passing through further woodland adjacent to the M25. From here, access is gained to the elevated Chalk Ridge to the north of Godstone, via a footbridge over the motorway.

5.5 **Viewpoint 4** is located at the top of the tumuli close to Footpath 122 to the south of the East Reservoir, at the north-western edge of the Godstone Conservation Area. Both the winter and summer photographs demonstrate the screening effect of mature trees and other vegetation along the southern edge of the East Reservoir. The partially evergreen woodland belt, along the northern edge of the Reservoir, adjacent to the Site, adds to this screening effect. Although views of the Site are prevented, existing housing along Tylers Close can just be glimpsed through a gap in the vegetation.

5.6 **Viewpoint 5** is located on Footpath 122 within the Surrey Hills AONB beyond the woodland to the west of the Site. The Site is screened by a combination of the offsite woodland belt, including the tall band of Poplars beyond its south-western boundary, and the maturing woodland planting along the quarry haul road. The roof of the Godstone Fire Station can just be glimpsed above the woodland, but it is anticipated that this will not be visible within a short time frame when the intervening vegetation matures further.

5.7 Photographs 6A and 6B from **Viewpoint 6** are taken from Footpath 119, the same footpath which passes along the north-eastern side of the Site. The viewpoint here is from the rising land on the Chalk Ridge within the Surrey Hills AONB to the north of the M25, to the north of the Site. From here the Site, the quarry haul road and built form within Godstone are screened by the woodland belts adjacent to the quarry haul road and the M25.

5.8 **Viewpoint 7** is located at the intersection of Bridleways 541a and 153, with the unclassified no through road, North Park Lane. As with Viewpoint 6, the location is on rising ground on the Chalk Ridge within the Surrey Hills AONB, to the north of the M25, to the north-west of the Site. Vegetation along the motorway and the quarry haul road, combine with the woodland belt to the west of the Site to screen it from view. The large-scale buildings of the Orpheus Centre, which lie
along North Park Lane approximately 350m to the west of the Site, and housing in the north-east of Godstone are visible from this location, with the M25 and associated infrastructure forming a dominant feature in the middle ground.

5.9 **Viewpoint 8** is located on the eastern edge of the viewing place on Gravelley Hill, towards the top of the Chalk Ridge within the Surrey Hills AONB, to the north of the M25. The viewing place comprises a grassed area with the occasional tree, which forms a small break in the otherwise substantially wooded hillside in this vicinity. Deciduous trees and shrubs of varying sizes lie adjacent to southern edge of the viewing place, and this creates a series of changing panoramas across the Greensand Valley towards the Greensand Hills to the south of Godstone, as well as towards more distant landscapes from certain parts of the viewing place.

5.10 The photographs illustrate that southern part of the Site is briefly visible as part of the wider panorama which includes substantial areas of built form and infrastructure within Godstone and sections of the M25 motorway. The Site is flanked by existing housing along Tylers Close, with further built form within Godstone seen beyond the woodland belt along the southern edge of the Site. It should be noted that in summer months when leaves are on the intervening deciduous vegetation, the extent of the Site that is visible is reduced.

5.11 The winter photograph at **Viewpoint 9** is taken from the more elevated southern end of the carpark associated with the Godstone Farm tourist attraction. The carpark is on rising ground adjacent to Tilburstow Hill Road within a part of the Surrey Hills AGLV which is a candidate area for possible inclusion within a proposed extension to the Surrey Hills AONB. Trees and other intervening vegetation prevent views northwards towards Godstone and the Site from most locations within the carpark, as shown in the summer photography from the central area of the Godstone Farm carpark. However, in this brief but wide-ranging view across the Greensand Valley towards the wooded Chalk Ridge to the north of the M25, housing at Godstone stretches across the lower slopes of the wooded Chalk Ridge. The distinctive form of the Godstone Fire Station can also be seen on these lower slopes. Whilst potential development at the Site would be screened from most locations within the Godstone Farm car park, where it is briefly visible, it would be seen in the context of existing built form at Godstone.

5.12 Views northwards towards Godstone from other publicly accessible locations located on more elevated parts of Tilburstowhill Common, such as PRoW and
roads, are largely prevented by the substantial tree cover. The agricultural fields to the west of Tilburstow Hill Road are not publicly accessible.

5.13 **Viewpoint 10** is taken from Rabies Heath Road on the northern edge of White Post, located within a part of the Surrey Hills AGLV which is a candidate area for possible inclusion within a proposed extension to the Surrey Hills AONB. From this location, the Site is hidden by substantial areas of woodland and other vegetation. The roofs of the Godstone Fire Station and housing at Tylers Close to the east of the Site form a small part of the wider panorama, which includes a range of other built form, including the Orpheus Centre. Similar views may be available from sections of the PRoW which descend northwards from Tilburstow Hill towards Godstone. However, as with Viewpoint 9, at lower elevations it is anticipated that intervening vegetation with the wider landscape will prevent or limit views towards Godstone. In any brief glimpses of potential development at the Site, it would typically be seen in the context of existing built form at Godstone.

5.14 Due to substantial tree cover, including the Tilburstowhill Plantation, there are very limited opportunities for publicly accessible winter and summer views towards Godstone and the north from Rabies Heath Road which crosses the north facing slopes of Tilburstow Hill. The principal views from Tilburstow Hill are from south facing locations towards the wider landscape to the south, i.e. looking away from Godstone and away from the Site.

**Visual Appraisal Summary**

5.15 The Site benefits from a high degree of visual containment provided by the woodland blocks adjacent to its north-eastern, northern, western and southern boundaries, by the housing along Tylers Close and by the Police and Fire Stations. Where there are views of the Site, it is seen within the context of other built form within Godstone, such as existing housing and/or the Fire and Police Stations.

5.16 The field study has shown that the visual envelope is largely limited to:

- The rear of properties which adjoin the Site, along western side of Tylers Close;

- Glimpses into the northern section of the Site, seen through vegetation along the PRoW, from a short section of footpath 119, where it passes
between the north-eastern edge of the Site and the Fire and Police Stations. These glimpses encompass views of existing residential properties at Tylers Close;

- Partial views of the southern half of the Site seen from the viewpoint at Gravelly Hill located on the Chalk Ridge to the north of the. In this partial view, the Site is seen as part of the wider panorama and immediately adjacent to and within the context of housing throughout Godstone.

- Elsewhere on the Chalk Ridge, including from large sections of the North Downs Way, views are prevented by the extensive woodland cover along the ridgeline and/or along the M25 and the quarry haul road adjacent to the Site or are very limited;

- Distant and partial views of the Site, forming a small part of a wider panorama which includes other built development, are available from a very limited number of publicly accessible locations on Tilburstowhill Common and Tilburstow Hill, within the Wooded Greensand Hills to the south of Godstone;

- Elsewhere within the AGLV (candidate area for the AONB), publicly accessible views are prevented or limited by the extensive woodland cover of the Greensand Hills; and,

- There may be other distant views towards the Site from publicly inaccessible locations within the Greensand Hills, such as agricultural fields, however, it is anticipated that these private views would encompass housing and other built form in Godstone and the surrounding area.
6. **GREEN BELT REVIEW**

   **Overview**

6.1 The Site and the surrounding area of Godstone have been the subject of a number of rounds of Green Belt review as set out in the Stage 1 and Stage 2 Green Belt Assessments published by TDC. Consideration of TDC’s findings is discussed later in this Landscape Statement. In order to inform this Statement, we have carried out an assessment from first principles of the contribution that the Site makes towards the purposes of the Green Belt. The definitions from TDC’s Green Belt Assessments are used to aid consistency in this assessment.

6.2 Following the site visit and a review of the baseline information, the Site has been assessed in terms of the five functions of the Green Belt as set out in the NPPF. It is noted that the same five functions are retained in the 2019 NPPF.

6.3 The NPPF states that the key characteristics of the Green Belt are "their openness and their permanence," (paragraph 79). In defining new boundaries to the Green Belt, it must be ensured that these characteristics are not diminished for the areas remaining within the Green Belt designation as a direct result of development on the identified sites.

6.4 Planning Practice Guidance (PPG) sits alongside the NPPF. With regard to the assessment of the impact that development can have on openness of the Green Belt, the updated PPG published in July 2019, notes that “openness is capable of having both spatial and visual aspects – in other words, the visual impact of the proposal may be relevant, as could its volume.”

6.5 An assessment has been made of the openness of the Green Belt in this particular location and to what extent the removal of the Site would have on the perception of openness in the remaining designated area.

6.6 In addition, the Site and its location have been appraised to establish their relationship to existing elements, such as motorways, waterbodies, ridgelines and areas of woodland. This is to help assess the impacts of the Proposed Development upon the openness of the remaining designated areas and to help identify boundaries that may be considered to be ‘permanent’.
The Site’s contribution to the purposes of the Green Belt

6.7 The Site’s contribution to each of the five purposes of the Green Belt is considered in turn below.

**Green Belt purpose 1: To check the unrestricted sprawl of large built up areas:**

6.8 The original purpose of the Metropolitan Green Belt was to restrict the outward expansion of Greater London, and this is considered to be the ‘large built up area’ in terms of this assessment. The Site is physically separated from Greater London by towns, villages, open countryside, transport and other infrastructure, including the M25. Given this existing context and the considerable distances involved, it is not considered that the Site would restrict the outward expansion of Greater London, and thus the Site does not contribute to checking urban sprawl of a large built up area.

6.9 The Site is physically contained by a combination of boundary hedgerows, woodland and/or built form along all of its boundaries. The settlement edge and built form within Godstone immediately adjoins the Site’s eastern boundary. The southern boundary is defined by a woodland belt and beyond that, the large waterbody of the East Reservoir Nature Reserve. The Site’s western and northern boundaries are defined by a tall hedgerow, whilst beyond that is the haul road for the North Park Quarry and its associated elevated bunds on which maturing woodland is already well-established. These well-defined physical features contain the Site and provide robust and defensible boundaries to any potential development on the Site, which would not lead to unrestricted sprawl.

6.10 The Site’s contribution to checking the unrestricted urban sprawl of a large built up area is assessed as None.

**Green Belt purpose 2: To prevent nearby towns from merging into one another:**

6.11 The Site lies immediately to the north-west of Godstone. Residential development on the Site would not be any further west or north than existing built form within the settlement boundary of Godstone e.g. to the south of the A25 and along the B2235 leading to the M25.
6.12 The nearest larger settlements to the west of Godstone are Caterham to the north-west and Bletchingley to the south-west. The nearest properties to the west of the Site are situated along North Park Lane, approximately 350m from its western boundary.

6.13 Caterham lies some 1.5km distance from Godstone and is physically separated from it by the M25 motorway and the intervening topography of the Chalk Ridge, including Gravelly Hill. Given the distance and the physical features which separate the settlements of Caterham and Godstone, development of the Site would not cause the physical or visual coalescence of these two settlements.

6.14 Similarly, Bletchingley lies 2km to the south-west of the Site and is physically separated from the settlement by fields, roads, woodland and the North Park Quarry and the former quarry site to the south-west of the East Reservoir. Given the distance and the physical features which separate the settlements of Bletchingley and Godstone, development of the Site would not cause the physical or visual coalescence of these two settlements.

6.15 The small number of isolated properties along North Park Lane, including the Orpheus Centre, are physically separated from the Site by agricultural fields, a woodland belt, and the quarry haul road and its associated bunds. These existing physical features would continue to provide both physical and visual separation between the Site and the small number of isolated properties. Development at the Site would be visually separated from these properties by the existing woodland and other vegetation, particularly as the maturing woodland along both sides of the quarry haul road continues to develop.

6.16 Development of the Site would not materially change the sense of separation between Godstone and the nearest larger settlements to the north-west and the south-west.

6.17 The Site’s contribution to preventing the merger of Godstone with nearby towns is assessed as None.

Green Belt purpose3: To assist in safeguarding the countryside from encroachment

6.18 Development on the Site would inevitably result in the loss of a single, undeveloped agricultural field. However, as noted within the Stage 1 TDC Green
Belt Assessment, the Site is subject to the “prominent” urbanising influence of the immediately adjacent development within Godstone and therefore does not display a strong rural character. Other settlements, such as Bletchingley and White Post lie within the Green Belt and these cannot be considered to affect the sense of openness of Green Belt otherwise they would be inset from it.

6.19 The Site is visually well-contained by robust boundary vegetation and other woodland within the immediate vicinity. As demonstrated within the Visual Appraisal section of this report, the effects of the change from an agricultural field would have a minor impact with visual effects experienced from only very localised areas. From the limited number of public locations where this visual change would be experienced, the Site would be seen in the context of immediately adjacent existing built form. From the elevated parts of the AONB to the north where views across the Greensand Valley towards the Greensand Hills are available, the Site would form a small part of a wider panorama which includes the settlement of Godstone as well as other infrastructure and development within the valley.

6.20 In publicly accessible views from the AGLV to the south of Godstone, the Site has limited visibility and where it is seen, it forms a small part of the wider panorama which encompasses other development within Godstone. Any change is likely to have a minor effect at most.

6.21 The Site’s contribution to safeguarding the countryside from encroachment is assessed as Limited.

**Green Belt purpose 4: To preserve the setting and special character of historic towns**

6.22 The settlement of Godstone has a Conservation Area centred around its historic core towards the south of the village. It is visually and physically separated from the Site by twentieth century development and by the East Reservoir and its associated mature tree cover. Given this separation, the Site is not considered to contribute to the setting of the Godstone Conservation Area.

6.23 The Church Town Conservation Area lies to the east of Godstone, separated from the Site by fields, water bodies (Bay Pond and the East Reservoir) and considerable development within the settlement. Given this physical and visual
6.24 **The Site’s contribution to the preservation of the setting of an historic town is assessed as None.**

*Green Belt purpose 5: To assist in urban regeneration by encouraging the recycling of derelict and other urban land*

6.25 Should the Site be brought forward for development, it would not prejudice derelict or other land being brought forward for regeneration. The principle of retaining land within the Green Belt holds true for all areas within the Green Belt and therefore the Site is considered to make the same contribution as any other parcel of land within the Green Belt.

6.26 **The Site’s contribution to assisting with urban regeneration is assessed as None.**

**Summary of assessment against Green Belt purposes**

6.27 In summary, the Site makes a very limited contribution to the five purposes of the Green Belt as defined in the NPPF, making no contribution to four of the five defined purposes.

6.28 With regard to safeguarding of the countryside from encroachment, there would be a technical change to development from the current land use of agricultural land. However, the land is subject to the urbanising influence of the adjoining housing within Godstone, which the TDC Green Belt Assessment describes as ‘prominent’ within the land. The Site benefits from strong visual and physical barriers along each of its boundaries. The wooded nature of much of the surrounding countryside also limits views into the Site, including from within both the AONB and the AGLV. As such, the opportunities to see any change of use to residential development are limited and would be frequently seen within the context of existing development at Godstone.

6.29 The NPPF states that the key characteristics of Green Belts are their openness and permanence. The land which largely comprises the Site is intrinsically open. However, the adjacent hedgerow, woodland and tree belts physically and visually enclose the Site. Similarly, the housing along Tylers Close and that associated
with the adjoining Police and Fire Stations, provide further enclosure, as well as a strong urbanising influence across the Site. Further limitations to development are provided by the East Reservoir and the quarry haul road and its associated wooded embankments. As such, any proposed development of the Site would be contained by the existing robust and permanent barriers in the immediate vicinity of the Site. These existing barriers would protect the openness of the adjoining areas of Green Belt to the north, south and west of the Site, whilst the settlement of Godstone currently lies within the Green Belt to the east of the Site. The Site would provide a coherent and logical extension to the north-west of Godstone.
7. CONSIDERATION OF TDC LANDSCAPE CAPACITY AND SENSITIVITY STUDY

7.1 The Tandridge Landscape Capacity and Sensitivity Study (TLCSS) (considers that the Site (which it refers to as GOD010 – refer to TLCSS extract at Appendix 7) has a Medium landscape capacity to accept housing development, stating “The site would potentially be suitable in landscape terms for limited housing proposals, but would need to demonstrate no adverse impacts on the setting of the existing landscape and settlement”. The Medium capacity rating is derived from Moderate Sensitivity and Value ratings, which consider a range of criteria.

7.2 The necessarily high-level nature of the TLCSS, across many sites throughout Tandridge, is understood, and this Landscape Statement provides a more detailed analysis of the potential for housing development at the Site. Based on our detailed field study work, the analysis set out within this Landscape Statement, and taking into consideration the sensitive response to landscape and visual issues illustrated by the Indicative Landscape Strategy for the Site, we consider that the Site has at least Medium to High capacity to accept housing development. Notwithstanding the concerns over the robustness of the assessment in the TLCSS as set out below, based on our Site-specific assessment and the findings of the TLCSS, there is a consensus of professional opinion that the Site has capacity to accommodate housing.

7.3 With regard to the Site, the TLCSS contains a number of inaccuracies and generalisations which have been examined as part of this Landscape Statement and these are discussed below.

7.4 The TLCSS incorrectly refers to GOD010 (the Site) as being comprised of ‘fields’. Whereas in fact GOD010 (the Site) comprises a single field with a small area of relatively recently planted woodland and part of the quarry haul road to its north.

7.5 The TLCSS includes a photograph of the Site the location of which is described as “View east from near Footpath 121”, whereas the accompanying map shows that it was actually taken from the side of the southern embankment along the quarry haul road. The text of the TLCSS incorrectly states at paragraph 1.2 that there are views into the site from Footpath 121. As shown on the viewpoint location map included within the TLCSS, Footpath 121 and the Site are physically and visually separated by quarry haul road and by the maturing woodland planting along the substantial embankments either side of the haul road. These
embankments and the maturing woodland on them prevent inter-visibility between the footpath and the Site. As the TLCSS text itself later notes at paragraph 1.3, “From the west views are restricted by a planted bund along a private road around the edge of the site.”

7.6 The TLCSS text also inaccurately states that properties and gardens along Fosterdown have views into the Site. Fosterdown is the small area of housing immediately to the south of the Police and Fire Stations. As illustrated by winter and summer Photographs 2A taken from Viewpoint 2 of this Landscape Statement, housing at Fosterdown is visually separated from the Site by the mature trees and other vegetation along the PRoW which adjoins the north-eastern boundary of the Site. In addition, a tall close-boarded fence along the PRoW adds further visual separation between the housing at Fosterdown and the Site.

7.7 The TLCSS text also notes at paragraph 1.2 that the spire of St Nicholas at Church Town, which lies to the east of Godstone, is visible from the Site. As described elsewhere in this Landscape Statement, Church Town is physically and visually separated from the Site by Bay Ponds, fields and the settlement of Godstone. It should be noted that the Site does not contribute to the setting of Church Town and its Conservation Area.

7.8 The Landscape Sensitivity Assessment set out within the TLCSS, states inaccurately that the Site is slightly further west than the existing settlement. Whilst the Site lies immediately adjacent to the north-western edge of Godstone, other built form within the settlement boundary to the south-west of Godstone lies at least as far to the west as the western edge of the Site.

7.9 The Landscape Value Assessment inaccurately states that Footpath 121 runs along part of the eastern boundary of the Site. As discussed above, Footpath 121 lies to the west of the Site and is separated from it by the quarry haul road and associated vegetated embankments.

7.10 With regard to the ‘Substantial’ visibility rating given to GOD010 in the TLCSS, as the photograph contained within the TLCSS demonstrates, whilst elevated areas of the AONB to the north of the M25 and the AGLV (candidate areas of AONB) to the south of Godstone, are visible from the vicinity of the Site, these areas are substantially wooded. This vegetation largely prevents views outwards from these
locations. Furthermore, as discussed within the Visual Appraisal contained within this Landscape Statement, the majority of the AONB land visible from the vicinity of the Site is not publicly accessible and, therefore, does not constitute the “public views” from the AONB referred to in Policy LUS of the Surrey Hills AONB Management Plan.

7.11 As the Visual Appraisal carried out for the Site and set out within this Landscape Statement demonstrates, there are limited publicly accessible opportunities to observe the Site from the Chalk Ridge within the AONB to the north of the M25. Where limited winter views are available, the Site is seen immediately adjacent to existing housing within Godstone, with the M25 and further built form elsewhere within the settlement adding to the Site’s immediate visual context. The Site forms part of the wider panorama of a partially settled valley, set between the wooded hillsides of the Chalk Ridge to the north and the Greensand Hills to the south, with glimpses of land further afield (see Viewpoint 8).

7.12 In terms of visibility from the AGLV, similarly, there are limited publicly accessible places from which the Site can be seen. Where it is visible, it forms a small part of a wider panorama across the valley floor towards the elevated Chalk Ridge to the north of the M25 (see photographs from Viewpoints 9 and 10). Typically, existing built form in Godstone forms the immediate context of the Site.

7.13 Based on the field work and analysis carried out for this Landscape Statement, and for the reasons described above, we disagree with the TLCSS that the visual sensitivity of the Site is "Substantial". However, we agree that the Site is “unremarkable”, that it makes “no contribution to separation between settlements”, that there are “urban influences from the adjacent housing to the east” and that “the planted bund along the west boundary and woodland beyond would form a new robust edge to settlement”.
8. **DESIGN STRATEGY AND INDICATIVE LANDSCAPE STRATEGY**

8.1 Published landscape policy and guidance, along with the initial findings of the Visual Appraisal set out in this Landscape Statement, have informed the potential site layout and the Initial Landscape Strategy provided with this report at Appendix 4. Key factors taken into consideration include: publicly accessible views to and from the AONB and the AGLV; the setting of Godstone as perceived from public locations; and, the opportunity to conserve and enhance the biodiversity potential of the Site.

8.2 In line with national and local policy advice and guidance, development at the Site would be set within a robust landscape framework, building on the existing landscape character of the area to conserve and enhance the biodiversity potential of the Site.

8.3 The existing maturing woodland which lies within the Site and immediately adjacent to the Ancient Woodland at Godstone corner Wood would be largely retained and would be subject to an on-going landscape management regime to ensure its continued health and development. This maturing woodland extends substantially beyond the often recommended 15m buffer zone to Ancient Woodland and would be supplemented by further landscape proposals in the north-eastern section of the Site, as indicated on the Initial Landscape Strategy at Appendix 4.

8.4 In line with Ecology evidence quoted in the TDC Sites Consultation (Regulation 18) report and with the draft Local Plan policies, a north-south corridor of informal, semi-natural green space would run along the western edge of the Site, contributing to the ecological networks between the Godstone corner Wood and the East Reservoir Nature Reserve. This would encompass areas of wild flower meadow, long grass, trees and native structure planting. It is anticipated that the introduction of these new habitats to the Site would enhance its biodiversity potential when compared to its current land use. The detailed landscape design for the Site would pay careful attention to the stated objectives for the WG011: Holmesdale BOA.

8.5 This landscape corridor reinforces the existing bund and woodland planting to the north and west of the Site to provide a readily recognisable feature that is likely to be permanent, in line with paragraph 85 of the NPPF.
8.6 In line with the published landscape character guidance for the LCA which encompasses the Site and Godstone, the Initial Landscape Strategy offers the opportunity to soften and better integrate the proposed settlement edge into the adjacent rural character compared to the current edge along the rear of Tylers Close.

8.7 With regard to the location of development within the Site, the western edge and the south-western corner of the Site have been kept free from development. This will provide an opportunity to provide a green corridor through the Site and will respect the setting of Godstone from the limited public views towards the Site from the Chalk Ridge within the AONB to the north of the M25. As illustrated by the photographs from Viewpoints 6, 7 and 8, the northernmost sections of the Site are not visible from many publicly accessible locations on the Chalk Ridge to the north of the M25.

8.8 Development has been limited on the more elevated north-western parts of the Site, such that it does not extend as far north as the Fire Station to its east. In addition, the potential storey height of development on these more elevated areas could be restricted to a maximum height of 1.5 storeys. This would limit the potential for views of housing in this area. It should be noted that publicly accessible views of the Site, from within the AGLV to the south of Godstone, are already limited and already encompass built form within Godstone, including the Fire Station and housing along Tylers Close (see photographs from Viewpoints 9 and 10). The maturing woodland on the substantial bunds along the adjoining section of the quarry haul road already provides screening to this northern part of the Site from most locations to the west and will provide a taller screen as the forest scale trees within the woodland planting mature further.
9. **SUMMARY AND CONCLUSIONS**

9.1 The Site comprises an agricultural field currently sown to grass immediately adjacent to the north-western edge of the settlement of Godstone, as well as a short section of quarry haul road. The Site benefits from strong visual and physical containment on all sides, provided by established and/or maturing woodland blocks and housing within Godstone. To the north and west of the Site the enclosure is further strengthened by the embanked and well vegetated haul road leading to the North Park Quarry, which is located to the south west of Godstone. The East Reservoir lies immediately adjacent to the woodland belt along the southern edge of the Site.

9.2 Relevant planning policy at national and local level seeks to protect the Green Belt from inappropriate development. It also advocates high quality design and the need to recognise and respond to local character whilst conserving and enhancing protected landscapes, as well as biodiversity.

9.3 Published landscape character assessments describe the largely wooded nature of the elevated Chalk Ridge and the Greensand Hills, which respectively lie to the north and south of the undulating valley landscape of the Greensand Valley which encompasses Godstone and the Site. Godstone is one of a number of settlements which lie along the lower valley slopes.

9.4 The published landscape guidance for this area also aims to promote the enhancement and linking of landscape features such as hedgerows, woodlands and species rich grasslands, whilst seeking biodiversity enhancement. The edge of settlements should be better integrated with the surrounding rural character, whilst the merging of individual settlements through dense linear development along roads should be avoided. Open views to the Greensand Hills and the Chalk Ridge should be conserved and enhanced. New development should be sympathetic to the wider pattern of settlement.

9.5 Small sections of the Site are located at the edge of the Surrey Hills AONB and the AGLV. Whilst the boundaries for both the AONB and the AGLV in relation to the Site were first published in 1958, this was before the advent of the M25 motorway and more recently the construction of the quarry haul road and its associated vegetated bunds. It is not obvious on what basis the original boundaries for both the AGLV and the AONB were defined in relation to the area encompassing and surrounding the Site. Certainly, there is no appreciable logic in
terms of either current landscape character or land use between the parts of the Site which are included within the AONB and the AGLV and those parts which are excluded, with the boundaries cutting across parts of the open field and the bunded haul road.

9.6 The AONB boundary will be subject to a forthcoming review by Natural England and following the review the AGLV designation will no longer apply. The Site is not identified as an additional area of land to be reviewed due to its comparable character with the AONB.

9.7 Various rounds of review of the AGLV boundaries carried out in the 1970’s, 1980’s and 2000’s have concluded that the vast majority of the Site which does not lie within either the AGLV or AONB designations does not share the characteristics of either the AONB or the AGLV.

9.8 Notwithstanding the above commentary in relation to the future AONB and AGLV boundaries, only small parts of the Site lies within the current AONB and/or the AGLV. To the north of the Site, the existing quarry haul road lies both within the AONB and the AGLV and will be utilised for the access to the Site. The relatively recent woodland planting, which is also largely within both the AONB and the AGLV boundaries, will be substantially retained and actively managed in line with biodiversity requirements, including the BOA designation.

9.9 Small sections of the central area of the Site lie both within the AONB (1.57ha) and the AGLV (0.52ha). Although their boundaries overlap they are not contiguous. As shown on the Testing Layout, there will be a relatively small number of houses on the Site which will lie within the AONB boundary, adjacent to existing properties at Tyler’s Close. However, the western side of the Site, a small pocket of which is partly encompassed by the AONB boundary, could include a continuous area of open space providing both amenity and biodiversity benefits, as shown on the Initial Landscape Strategy plan. Given the proposed balance between open space and potential housing development within the very limited section of the AONB which lies within the central section of the Site, and with regard to footnote 55 of the NPPF, it is not considered that the potential development at the Site would constitute major development in the AONB. As noted above, the various independent reviews of the AONB boundary have concluded that this part of the AONB does not demonstrate characteristics comparable with the AONB, and we would concur with these assessments.
9.10 An initial visual appraisal of the Site has been carried out to establish the nature and extent of views of the Site from publicly accessible locations within the surrounding area, including from elevated land within the Surrey Hills AONB to the north, and from elevated sections of the Greensand Hills to the south. The Site benefits from a high degree of visual containment provided by the woodland blocks adjacent to its north-eastern, northern, western and southern boundaries, by the housing along Tylers Close and the Police and Fire Stations. Where there are views of the Site, it is seen within the context of other built form within Godstone, such as existing housing and/or the Fire and Police Stations which adjoin the Site.

9.11 The Site contributes very poorly to the five purposes of the Green Belt as defined in the NPPF. It makes no contribution to four of the five purposes: checking the unrestricted sprawl of large built up areas; preventing nearby towns from merging; the setting of historic towns; or the assisting with urban regeneration.

9.12 With regard to safeguarding of the countryside from encroachment, the Site is considered to make a Limited contribution. There would be a technical change to development from the current land use of an agricultural field immediately adjacent to the settlement edge. However, the field is subject to the urbanising influence of the adjoining housing within Godstone, which the TDC Green Belt Assessment describes as “prominent” within the field. The wooded nature of much of the surrounding countryside also limits views into the Site, including from within both the AONB and the AGLV. As such, the opportunities to see any change of use to residential development are limited, and the Site would be frequently seen within the context of existing development at Godstone.

9.13 The NPPF states that the key characteristics of Green Belts are their openness and permanence, whilst PPG (2019) also notes that openness has both spatial and visual aspects. The field which largely comprises the Site is intrinsically open from a spatial perspective. However, the adjacent hedgerow, woodland and tree belts physically and visually enclose the Site. Similarly, the housing along Tylers Close and that associated with the adjoining Police and Fire Stations, provide further enclosure, as well as a strong urbanising influence across the Site. Further limitations to development are provided by the East Reservoir and the quarry haul road and its associated wooded embankments. As such, any proposed development of the Site would be contained by the existing robust barriers which are likely to be permanent in the immediate vicinity of the Site. These existing
barriers would protect the openness of the adjoining areas of Green Belt to the north, south and west of the Site, whilst the settlement of Godstone already lies within the Green Belt to the east of the Site. It is considered that the Site would provide a coherent and logical extension to the north-west of Godstone.

9.14 The TDC Landscape Capacity and Sensitivity Study (TLCSS) considers that the Site (which it refers to as GOD010) has a Medium landscape capacity to accept housing development, stating "The site would potentially be suitable in landscape terms for limited housing proposals, but would need to demonstrate no adverse impacts on the setting of the existing landscape and settlement".

9.15 The necessarily high-level nature of the TLCSS, across many sites throughout Tandridge, is understood, and this Landscape Statement provides a more detailed analysis of the potential for housing development at the Site. Based on our field study work, the analysis set out within this Landscape Statement and taking into consideration the sensitive response to landscape and visual issues illustrated by the Indicative Landscape Strategy for the Site, it is considered that the Site has at least Medium to High capacity to accept housing development.

9.16 With regard to the Site, the TLCSS contains a number of inaccuracies and high-level generalisations which are examined in more detail within the Landscape Statement. Notwithstanding these concerns over the robustness of the assessment in the TLCSS, based on our Site-specific assessment and the findings of the TLCSS, there is a consensus of professional opinion that the Site has capacity to accommodate housing.

9.17 Published landscape policy and guidance, along with the initial findings of the Visual Appraisal set out in this Landscape Statement, have informed the potential site layout and the Initial Landscape Strategy provided with this report. Key factors taken into consideration include, publicly accessible views to and from the AONB and the AGLV, the setting of Godstone as perceived from public locations and the opportunity to conserve and enhance the biodiversity potential of the Site.

9.18 In line with national and local policy advice and guidance, development at the Site would be set within a robust landscape framework, building on the existing landscape character of the area to conserve and enhance the biodiversity potential of the Site.
9.19 With regard to the location of development within the Site, the western edge and the south-western corner of the Site have been kept free from development. This will provide an opportunity to provide a green corridor through the Site and will respect the setting of Godstone from the limited public views towards the Site from the Chalk Ridge within the AONB to the north of the M25. Development has been limited on the more elevated north-western parts of the Site, such that it does not extend as far north as the Fire Station to its east. In addition, the potential storey height of development on these more elevated areas could be restricted to a maximum height of 1.5 storeys.

9.20 In summary, the Site represents an appropriate location for new housing development that can be sensitively designed to take account of the setting of Godstone, biodiversity considerations and views to and from the AONB and the AGLV.
APPENDIX 1

VIEWPOINT LOCATIONS AND LANDSCAPE DESIGNATIONS PLAN
APPENDIX 2

SUMMER PHOTOGRAPHS FROM VIEWPOINTS 1 TO 10;
VIEWPOINT 1A

View from southern boundary of the site, looking north-west

Woodland and hedge along Site's south western boundary

Wooded slopes of Gravelly Hill

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VIEWPOINT 1B
View from southern boundary of the site, looking north

Woodland planting on elevated bund along quarry haul road

Housing along Tylers Close adjacent to south eastern Site boundary

- Camera make & model: Canon EOS 5D
- Date & time of photograph: 10/07/2019 @ 12:48
- OS grid reference: 534766, 152190
- Viewpoint height (AOD): 114m
- Distance from site: Edge of site

© Crown copyright, All rights reserved. 2016 emapsite Licence number 0100031673
VIEWPOINT 2A
View from north western edge of Site, looking east

Camera make & model - Canon EOS 5D
Date & time of photograph - 10/07/2019 @ 13:30
OS grid reference - TQ34758, 152527

Viewpoint height (AGD) - 129m
Distance from site - Edge of site

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VIEWPOINT 2B

View from north western edge of Site, looking south-east

- Camera make & model: Canon EOS 5D
- Date & time of photograph: 10/07/2019 @ 13:30
- OS grid reference: 534758, 152527
- Viewpoint height (AGDD): 129m
- Distance from site: Edge of site

Housing at Tylers Close, adjacent to eastern edge of Site
Dense vegetation along southern Site boundary
Existing housing
VIEWPOINT 3

View from Public Right of Way Footpath 119, adjacent to eastern side of Site, looking southwest.
Reservoir hidden by dense evergreen and deciduous vegetation (Site not visible)

VIEWPOINT 4

View from tumuli close to Footpath 122 to south of East Reservoir, looking north
VIEWPOINT 5

View from Footpath 122, looking east

Godstone Fire Station

Band of Poplars and dense woodland planting adjacent to south western Site boundary (Site not visible)

Camera make & model - Canon EOS 5D
Date & time of photograph - 10/07/2019 @ 13:16
OS grid reference - 534264, 152260

Viewpoint height (AGD) - 122m
Distance from site - 350m
VIEWPOINT 6A
View from Footpath 119, looking south-east

Vegetation obscures views of Site and quarry haul road

M25 Motorway

© Crown copyright, All rights reserved. 2016 emapsite Licence number 0100031673
VIEWPOINT 6B
View from Footpath 119, looking south

Camera make & model - Canon EOS 5D
Date & time of photograph - 10/07/2019 @ 13:41
OS grid reference - 534762, 152855

Viewpoint height (AGD) - 143m
Distance from site - 120m

Approximate location of the Site
(hidden behind extensive vegetation)
VIEWPOINT 7

View from junction of Bridleways 541a and 153 adjacent to North Park Lane, looking south-east

Camera make & model - Canon EOS 5D
Date & time of photograph - 10/07/2019 @ 15:39
OS grid reference - TQ4040, 152793
Viewpoint height (AOD) - 157m
Distance from site - 665m

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Housing at Godstone
Approximate location of Site (hidden by vegetation)
Poplars and tree belt adjacent to southwest of the Site
The Orpheus Centre

The Orpheus Centre

Approximate location of Site (hidden by vegetation)
VIEWPOINT 8
View from viewing place at Gravelly Hill, looking south-east

- Camera make & model: Canon EOS 5D
- Date & time of photograph: 10/07/2019 @ 12:12
- OS grid reference: 534178, 153312
- Viewpoint height (AGD): 211m
- Distance from site: 820m

Housing at Godstone
Dense woodland belt to west of Site
Treebelt along southern edge of Site
Location of M25 (obscured by vegetation)
VIEWPOINT 9

View from central area of carpark at Godstone Farm, looking north-west

Camera make & model - Canon EOS 5D
Date & time of photograph - 00/00/2019 @ 00:00
OS grid reference - 534054, 150240
Viewpoint height (AOD) - 148m
Distance from site - 2km

Development at Godstone obscured by vegetation
Approximate location of Site
VIEWPOINT 10
View from Rabies Heath Road, looking north-east

Camera make & model: Canon EOS 5D
Date & time of photograph: 10/07/2019 @ 15:12
OS grid reference: 53363, 150554
Viewpoint height (AGD): 128m
Distance from site: 1.9km

Approximate location of Site (hidden by vegetation)
Godstone Fire Station and housing at Tylers Close
The Orpheus Centre

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APPENDIX 3

WINTER PHOTOGRAPHS FROM VIEWPOINTS 1 TO 10
VIEWPOINT 1A

View from southern boundary of the site, looking north-west

Woodland and hedge along Site’s south western boundary

Wooded slopes of Gravelly Hill

Camera make & model: Canon EOS 500D
Date & time of photograph: 10/11/2016 @ 12:16
OS grid reference: 534766, 152190
Viewpoint height (AOD): 114m
Distance from site: Edge of site

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VIEWPOINT 1B
View from southern boundary of the site, looking north
VIEWPOINT 2A

View from north western edge of Site, looking east

Camera make & model - Canon EOS 500D
Date & time of photograph - 10/11/2016 @ 13:01
OS grid reference - 534758, 152527

Viewpoint height (AOD) - 129m
Distance from site - Edge of site

Police Station and Fire Station
Public Right of Way located within off site trees and other vegetation along north eastern edge of Site
Housing at Tylers Close
VIEWPOINT 2B
View from north western edge of Site, looking south-east

Camera make & model - Canon EOS 500D
Date & time of photograph - 10/11/2016 @ 13:01
OS grid reference - 534758, 152527

Viewpoint height (AOD) - 129m
Distance from site - Edge of site

Housing at Tylers Close, adjacent to eastern edge of Site
Dense vegetation along southern Site boundary
Existing housing
VIEWPOINT 3

View from Public Right of Way Footpath 119, adjacent to eastern side of Site, looking southwest.
Reservoir glimpsed between dense evergreen and deciduous vegetation (Site not visible)
VIEWPOINT 5

View from Footpath 122, looking east

- Camera make & model: Canon EOS 500D
- Date & time of photograph: 10/11/2016 @ 14:54
- OS grid reference: 534264, 152260
- Viewpoint height (AOD): 122m
- Distance from site: 350m

Godstone Fire Station

Band of Poplars and dense woodland planting adjacent to south western Site boundary (Site not visible)
VIEWPOINT 6A
View from Footpath 119, looking south-east

Camera make & model: Canon EOS 500D
Date & time of photograph: 10/11/2016 @ 13:26
OS grid reference: 534762, 152855
Viewpoint height (AOD): 143m
Distance from site: 120m

Vegetation obscures views of Site and quarry haul road
M25 Motorway

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VIEWPOINT 6B
View from Footpath 119, looking south

Approximate location of the Site (hidden behind extensive vegetation)
VIEWPOINT 7

View from junction of Bridleways 541a and 153 adjacent to North Park Lane, looking south-east

Camera make & model - Canon EOS 500D
Date & time of photograph - 10/11/2016 @ 15:11
OS grid reference - 534040, 152793
Viewpoint height (AOD) - 157m
Distance from site - 665m
VIEWPOINT 8

View from viewing place at Gravelly Hill, looking south-east

Camera make & model - Canon EOS 500D
Date & time of photograph - 10/11/2016 @ 14:31
OS grid reference - TQ 534178, 153312
Viewpoint height (AOD) - 211m
Distance from site - 820m

Housing at Godstone
Dense woodland belt to west of Site
Treebelt along southern edge of Site
Traffic on M25

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VIEWPOINT 9

View from southern end of carpark at Godstone Farm, looking north-west

Camera make & model  - Canon EOS 500D
Date & time of photograph  - 10/11/2016 @ 15:58
OS grid reference - 534054, 150240

Viewpoint height (AOD) - 148m
Distance from site - 2km

Approximate location of the Site

Housing at Tylers Close
Godstone Fire Station
Other housing at Godstone
Other housing at Godstone

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VIEWPOINT 10

View from Rabies Heath Road, looking north-east

- Camera make & model: Canon EOS 500D
- Date & time of photograph: 10/11/2016 @ 16:07
- OS grid reference: 53363, 150554
- Viewpoint height (AOD): 128m
- Distance from site: 1.9km

Approximate location of Site (hidden by vegetation)

The Orpheus Centre

Godstone Fire Station and housing at Tylers Close
APPENDIX 4

INDICATIVE LANDSCAPE STRATEGY
Existing young woodland planted on bund

Existing hedgerow forms the western edge to the open space

Native structural planting with clusters of trees will provide new habitats and soften views of the built form.

Swales will enhance biodiversity and contribute to sustainable drainage strategy.

Local green within residential area with potential SuD feature

Avenue tree planting to provide strong green routes through the developing site.

Indicative Landscape Strategy
Land West of Godstone, Surrey

Client: M&G UK PLP

DRWG No: LON.0629_06

Sheet No: __ REV: A

Date: 15/12/2016

Scale: 1:2500 A3
APPENDIX 5

TESTING LAYOUT
<table>
<thead>
<tr>
<th>House Type</th>
<th>Square Footage</th>
<th>No of Units</th>
<th>No of Beds</th>
<th>Total Sqft</th>
<th>Total %</th>
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<td>OPEN MARKET</td>
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<td>3 BED HOUSES</td>
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<td>TOTAL</td>
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<td></td>
<td>100%</td>
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</table>

AFFORDABLE:

<table>
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<tr>
<th>House Type</th>
<th>Square Footage</th>
<th>No of Units</th>
<th>No of Beds</th>
<th>Total Sqft</th>
<th>Total %</th>
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<tbody>
<tr>
<td>OPEN MARKET</td>
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<td>5 APARTMENT</td>
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</tr>
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<td>6 APARTMENT</td>
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<td>3</td>
<td>3440</td>
<td>12%</td>
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<tr>
<td>TOTAL</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>100%</td>
</tr>
</tbody>
</table>

AFFORDABLE TOTAL: 6900

NET DEVELOPABLE AREA: 6279 m²

COVERED: 13933 sq/m²

DENSITY: 20 ppt
APPENDIX 6

EXTRACT FROM TANDRIDGE DISTRICT COUNCIL’S GREEN BELT ASSESSMENT (PART 3): APPENDIX 1 (2018), IN RELATION TO GOD 010
# GOD 010 – Land to the west of Godstone

## Proposed Development: Residential, 150 units

### Spatial Strategy

| Is the site strategy compliant? | The site is undeveloped land located on the edge of the built-up area of Godstone, a sustainable settlement designated as Tier 2 in the Council’s Settlement Hierarchy and identified as a preferred location for development as part of the spatial strategy. Godstone is currently a Defined Village in the Green Belt, and as such is washed over by the Green Belt, however this report recommends that it should be inset and therefore taken out of the Green Belt. Accordingly, the Council consider that the site is strategy compliant and would have a significant role to play in achieving sustainable patterns of development across the district. |

### Green Belt Assessment

| Does the Green Belt Assessment recommend that the GB in this location should be retained/or further considered in terms of exceptional circumstances? | The site has been considered through the Green Belt Assessment Part 1 as part of GBA 015, which concludes, at a high level, that the parcel continues to play a role in maintaining separation between Godstone and Bletchingley, and preserving the setting of the two conservation areas and that to its south it is largely free from development, with the village of Godstone seen as encroachment and having potentially sprawled and thus requiring further investigation in Part 2. The site is also considered through Part 2 as an Area for Further Investigation (AFI 017) as part of the Defined Village of Godstone, which concludes that development beyond the Defined Village boundaries, is more sporadic and interspersed and makes a contribution to the openness of the surrounding Green Belt. Accordingly it is recommended to be retained. |

| What is the nature and extent of the harm to the Green Belt if the site is developed? | Given the site’s scale and location, it is considered that its development would have a minimal impact in terms of preventing settlements merging and preserving the setting of the conservation area but there would be loss of openness and it would result in sprawl and encroachment on the countryside. It is also considered that if a robust and defensible boundary could be secured, its impact on the wider |
### GOD 010 – Land to the west of Godstone

<table>
<thead>
<tr>
<th>Question</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>To what extent can the consequent impacts on the purposes of the Green Belt be ameliorated or reduced to the lowest reasonably practicable extent?</td>
<td>The site is visually and physically well contained by the road and bunding and its impact could be reduced through sensitive design, buffers and landscaping. Furthermore the temporary quarry access road and the bund to the west provide a defensible boundary to contain development in Godstone; thereby limiting the impact on the wider Green Belt.</td>
</tr>
</tbody>
</table>

### Other evidence base considerations

<table>
<thead>
<tr>
<th>Question</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>Does the ecology evidence consider the site is ecologically suitable?</td>
<td>The ecology evidence has determined that this site is Ecologically Suitable for housing development (8.5ha). Development should be located within the ecologically suitable parts of the site and access using existing roadways, whilst protecting adjoining woodland and protecting and buffering the tree belt and hedgerows connecting Ancient Woodland to the pSNCI. There are opportunities for development to contribute to ecological networking through extension of the north-south corridor towards the East Reservoir Nature Reserve. Should this site be allocated, the developable area is likely to be amended to reflect the constraints.</td>
</tr>
<tr>
<td>Does the landscape evidence consider the site has capacity to accommodate development in the landscape?</td>
<td>Site has moderate landscape sensitivity and value and as a result it is judged to have a medium landscape capacity for limited housing development, subject to it being demonstrated that there would be no adverse impacts on the setting of the landscape and settlement. It would need to be of a form that is closely related to, and in scale with, the existing settlement adjacent to the site. There is inter-visibility with the AONB to the north and the Candidate AONB to the south, with small parts of the site within the AONB, and the impact would be difficult to mitigate. It is also recommended that the northern portion of the site is maintained for open space and planting.</td>
</tr>
<tr>
<td>Does the Open Space, Sport and Recreation Facilities Assessment consider that the site is surplus provision or can facilities be re-provided elsewhere?</td>
<td>Not applicable as the site is not existing open space. However, the population resulting from proposed development on this site would generate demands for open space. These would need to be considered against existing provision in the parish and result in policy requirements for on or off-site provision, if the site is allocated.</td>
</tr>
<tr>
<td>Does the Sustainability Appraisal consider that the site is a sustainable location?</td>
<td>It considers that the site can provide sufficient housing, has satisfactory access to a GP surgery, a bus stop, a primary school and is within 600m of registered public open space located to the north of the M25. The site is adjacent to the M25, which dominates the local landscape and as such development of this site would be expected to have a negligible effect on the landscape. However, employment opportunities and access to public transport and secondary schools are limited, and it is likely that there will be a reliance on cars for accessing facilities and amenities and for commuting; if developed, sustainable transport measures and electric charging points would need to be encouraged. In addition there is no registered public open space within Godstone village however the site has access to, a large open recreational space in the centre of Godstone, albeit it is not registered public open space. In addition, development has the potential to adversely affect the water quality of the reservoir, and it would be necessary to regulate and monitor water quality. Its development would be expected to lead to the loss of soil, as the site is not previously developed land. In addition, the site is adjacent to</td>
</tr>
</tbody>
</table>
**GOD 010 – Land to the west of Godstone**

Junction 6 of the M25 and may be adversely affected by noise and air pollution from the motorway. It is within the Greensand Valley Landscape Character Area (LCA), and development in this area should seek to avoid urban coalescence and maintain the sparse settlement of farmsteads, but being on the urban edge, its development is unlikely to adversely affect these guidelines. This site is also adjacent to Ancient Woodland, which may require mitigation measures. The site comprises land classified as both Grade 3 (good to moderate quality) and Grade 4 (poor quality) land under the Agricultural Land Classification system.

<table>
<thead>
<tr>
<th><strong>Is the site sequentially preferred? Would development of this site increase flood risk or impact on water quality?</strong></th>
<th>The site is located within Flood Zone 1, with low risk of surface water flooding and negligible groundwater risk; as such it is sequentially preferred. It is within Groundwater Source Protection Zone 3, and ‘Major Aquifer High’ Groundwater Vulnerability Zone, with potential risk to groundwater quality. In order to mitigate these effects, it would be necessary to regulate and monitor water quality and SUDs would be required.</th>
</tr>
</thead>
</table>
| **Is the proposed development of the site likely to result in harm that would be difficult to mitigate and/or provide opportunities for community benefit?** | • Community Infrastructure Levy eligible/potential contributions or on-site provision of infrastructure  
• Biodiversity enhancement opportunities comprising strengthening of defunct hedges and the tree belt, recreate hedge along garden boundaries to the east to link to woodland and establish a new wetland.  
• Pedestrian access is to be retained and enhanced. |

**Discussion**
Are there exceptional circumstances that would outweigh the harm to the Green Belt and justify Green Belt release?

Having considered (i) the acuteness/intensity of the objectively assessed need for housing, (ii) the inherent constraints on supply/availability of land prima facie suitable for sustainable development and (iii) the consequent difficulties in achieving sustainable development without impinging on the Green Belt (Calverton principles (i) to (iii)) in the main report, as well as the reasonable options set out in the draft NPPF 2018, it is evident that development within the Green Belt is necessary.

In light of the above, housing development on this site would make a contribution of 150 units which would help meet the district’s housing need in the short term, consistent with the principles of sustainable development. Furthermore, the site comprises undeveloped land located on the edge of a Tier 2 settlement, which is designated as a Defined Village in the Green Belt, and as such is in a preferred location on sustainability grounds, being within close proximity to a GP surgery, a primary school, countryside and bus stops. In addition, the site is considered, in principle, suitable for development from a landscape and ecology perspective subject to mitigation measures. Other potential adverse effects such as the impact upon surface water flooding could similarly be adequately mitigated.

The development of this site would result in sprawl, the encroachment on countryside and it would impact upon openness of the Green Belt and as such would impact on the Green Belt purposes. However, the site is visually contained within the vicinity, with a bund and hedging to its west, the treed buffer to the M25 to the north, it is connected to the settlement on two sides with the strong tree line and reservoir to the south effectively halting developable form, and these factors coupled with sensitive design could reduce its impact, whilst the presence of a robust and defensible boundary in the form of the access road/planted bund would ensure the impact on the wider Green Belt’s ability to serve the Green Belt purposes could similarly be reduced. Further, this site is not in close proximity to a secondary school, there are limited employment opportunities and there would be reliance on the private car for access to facilities and amenities.

However, the development would attract CIL, and as such would contribute towards infrastructure needed to support the growth of the district. Furthermore, it is considered that subject to appropriate design that relates well to the surrounding landscape and existing settlement, development would make a positive contribution to settlement form. Further that its development could secure public open space provision, which would help mitigate its impact on landscape grounds but which would also provide a wider community benefit. It could also secure enhancements to biodiversity.

Having considered all of the factors set out in section 3 of the paper “Green Belt Assessment Part 3: Exceptional Circumstances and Insetting” it is considered, as a matter of planning judgement, that this site does justify the exceptional circumstances necessary to recommend amendment of the Green Belt boundary.

Is there an alternative boundary that would be suitable, permanent and endure in the long term and serve to meet the exceptional circumstances of this site?

The temporary quarry access road along the north-western site boundary provides a defensible boundary.
APPENDIX 7

EXTRACT FROM TANDRIDGE LANDSCAPE CAPACITY AND SENSITIVITY STUDY (OCTOBER 2016), IN RELATION TO SITE GOD010
Tandridge Landscape Capacity and Sensitivity Study

October 2016
06 Godstone

Godstone Analysis Plan (Area 06)  See Figure 1 on page 4 for plan location
Godstone Settlement Analysis

1.1 Godstone is located near the centre of Tandridge, approximately 2km to the south of Caterham, and 2km east of Bletchingley. The village is located along the A25 road, adjacent to the M25 motorway junction with the A22. The northern edge of the settlement meets the Surrey Hills AONB within the vicinity of the M25 motorway, and the southern edge is within close proximity of an area of Wooded Greensand Hills which are under consideration as a candidate area for inclusion within the AONB.

1.2 Godstone sits within the Greensand Valley, an east-west band of undulating landform, below the south facing scarp of the North Downs to the north, and the distinctive wooded Greensand Hills to the south. The northern extent of the village rises on foothills below the North Downs, while the southern part of the settlement falls towards watercourses before rises slightly at the foot of the Greensand Hills.

1.3 The historic core of Godstone, with its conservation area including listed buildings, a village green and pond, is centred on the junction of the A25 and a Roman Road/B2236. The village has grown along, and spread out from the main spine roads through the village, more so to the north, than the south, but remains largely contained within the Greensand Valley.

1.4 Relatively modern housing development has taken place to the north-west of Godstone between the B2235 and the A22 road, which by-passes the village on its way to the M25. Development to the north-west has been more restrained, and fields which form site GOD010 abut the village to the west. These fields are contained along their western edge by planting on mounding along a quarry pit haul route.

1.5 Previous quarrying has left large excavated depressions to the west of the village centre, one currently used as a lake and the other is becoming recolonised by vegetation. Together these areas form site GOD001.

1.6 Closer to the village centre and within the conservation area, there is a linear group of small sites, ENA03, GOD004, GOD008 and GOD017, which are largely tucked behind buildings along the high street. GOD012 is slightly south, on the opposite side of the high street. Site GOD022 is adjacent to the south-west of the village, beyond the water course which currently defines the extent of settlement. Site ENA04 is detached to the south-west of the village.

1.7 Site ENA33 is located along the A25, on the eastern edge of Godstone, albeit it separated by a watercourse and associated vegetation. Site ENA05 is detached from Godstone, located at Rooks Nest Farm, approximately 1km to the east of the village.
Photograph 56: View east from near Footpath 121

Site Visibility (see accompanying photograph above):

1.1 Site GOD010 is a large field attached to the western boundary of the Tyler’s Green area of Godstone. Set on the lower slopes adjacent to the Surrey Hills AONB it has a large visual envelope to the north and the south, see panorama above.

1.2 The views from the east are mostly localised and filtered, however due to the size of the site this effects a large number of houses and gardens along Tylers Close and Fosterdown. There are also views into the site from Footpath 121 and distant views of Godstone and Church Town.

1.3 From the west views are restricted by a planted bund along a private road around the edge of the site. From the north there is intervisibility with the Surrey Hills AONB, including from the extensive public rights of way network. From the south there is intervisibility with the Candidate AONB, Greensand Hills.

1.4 Overall, the visual sensitivity is judged to be Substantial. This rating feeds into the following overall sensitivity assessment table.

Landscape Capacity:

2.1 The landscape capacity for housing development of the site has been determined by combining the sensitivity and value assessments set out on the following page, using the capacity matrix table. The capacity of the site is as follows:

Moderate sensitivity x Moderate value = Moderate landscape capacity

2.2 Site GOD010 has moderate landscape sensitivity and value. As a result it is judged to have a medium landscape capacity for housing development overall. The site would potentially be suitable in landscape terms for limited housing proposals, but would need to demonstrate no adverse impacts on the setting of the existing landscape and settlement. Other evidence relevant to the site’s suitability for development should also be considered.
### Landscape Sensitivity:

<table>
<thead>
<tr>
<th>Inherent landscape quality (intactness and condition)</th>
<th>Ecological sensitivity</th>
<th>Inconsistency with existing settlement form/pattern</th>
<th>Contribution to separation between settlements</th>
<th>Contribution to the setting of surrounding landscape/settlement</th>
<th>Views (visual sensitivity)</th>
<th>Potential for mitigation</th>
<th>Overall sensitivity judgement</th>
</tr>
</thead>
<tbody>
<tr>
<td>2</td>
<td>2</td>
<td>3</td>
<td>1</td>
<td>3</td>
<td>4</td>
<td>2</td>
<td>17</td>
</tr>
</tbody>
</table>

The majority of the site is grass, pasture, with limited tree cover.

There is a young clipped hedge around the western perimeter, and a couple of mature trees and scrub planted around areas to the northeast.

Majority of site grade 3 agricultural land.

The site is adjacent to ancient woodland to the north east.

The site slopes slightly uphill and is slightly further west than the existing settlement.

It is connected to the settlement boundary on two sides.

The planted bund along the west boundary and woodland beyond would form a new robust edge to settlement.

The site has no contribution to separation between settlements.

The site is contained within the vicinity but visible from high ground within the AONB to the north and the Greensand Hills to the south.

It therefore forms part of the transition between the two.

Local enclosure limits contribution to setting of settlements.

The site is contained to the west by the planted bund.

However the majority of the site is intervisible with both the AONB to the north and the Greensand Hills Candidate AONB to the south.

Godstone church tower is visible to the east.

There are filtered views of the site from housing to the east, including a public right of way.

There is existing advanced planting on the bund and hedge planted along the west boundary.

It would be difficult to mitigate views from the AONB and Candidate AONB.

Maintain northern portion of the site for open space and planting.

**MODERATE**

### Landscape Value:

<table>
<thead>
<tr>
<th>Landscape designations</th>
<th>Ecological and other designations (e.g. heritage, flood zone etc)</th>
<th>Local distinctiveness</th>
<th>Any historic/cultural/literary associations</th>
<th>Contribution to setting of ‘outstanding assets’</th>
<th>Recreation and public access/locally valued spaces</th>
<th>Perceptual aspects (e.g. scenic quality, tranquility, and remoteness)</th>
<th>Overall value judgement</th>
</tr>
</thead>
<tbody>
<tr>
<td>4</td>
<td>2</td>
<td>2</td>
<td>1</td>
<td>4</td>
<td>2</td>
<td>3</td>
<td>18</td>
</tr>
</tbody>
</table>

Small parts of the northern and western parts of the site are within the AONB.

The site is adjacent to ancient woodland to the north east.

The site is unremarkable but does have distinctive views of the AONB and Candidate AONB to the north and south.

Surrey Historic Landscape Characterisation:

1. FIELD PATTERNS/SYSTEMS

114. ‘Prairie’ fields (large enclosures with extensive boundary loss)

The site is a small part of the wider setting between the Greensand Hills and AONB.

The site forms part of the immediate southern setting to the AONB.

There are no heritage assets nearby.

There is no formal or informal public access into the site.

There is a public right of way, Footpath 121 along parts of the eastern boundary.

The site is adjacent to AONB which is of high scenic quality.

There are urban influences from the adjacent housing to the east, noise of the M25 and overhead aircraft.

**MODERATE**
APPENDIX 3

STATEMENT OF DELIVERY
TANDRIDGE DISTRICT COUNCIL
OUR LOCAL PLAN 2033

SITE HSG11

STATEMENT OF DELIVERY

BETWEEN

TANDRIDGE DISTRICT COUNCIL (TDC)

AND

M & G REAL ESTATE

December 2018
Context

Land to the West of Godstone

The site is adjacent to the west of the built settlement of Godstone and to the north of the Godstone reservoir. Parts of the site, to the north-east and north-west, are located within the Surrey Hills Area of Outstanding Natural Beauty, and the M25 and junction 6 are also located north and north-east of the site, respectively.

Access to the North Park Farm Quarry is provided to the north-east of the site via an existing haul-road and is screened by an associated bund, which bounds the site on its northern and western boundaries.

The site is in singular ownership and was previously submitted through the Housing and Economic Land Availability Assessment process under reference GOD 010.

The site is being represented on behalf of the landowners/promoters (M & G Real Estate) by one party – Pegasus Group
Policy

This site is allocated as HSG11 in the July 2018, Regulation 19 iteration of Our Local Plan: 2033 for 150 residential units and associated infrastructure.

The site’s representative has requested that the Statement of Delivery be amended to refer to ‘an estimated yield of 150 residential units’. Furthermore, they have requested that it be highlighted that they consider that the site has capacity for circa 250 dwellings. However, TDC’s preference is to retain the present wording. TDC would have it noted that they have not specified in the Local Plan that the amount of units are maximums.

Any delivery of this site will be in accordance with all relevant policies of the Development Plan, including the provision of 40% affordable housing, along with other appropriate infrastructure contributions.

Given the undeveloped nature of the site, which comprises greenfield land released from the Green Belt for development, constraints to development are not considered to be of any significance or hindrance to delivery. That said, the landscape and layout of the site will be mindful of its location on the edge of the settlement and robust Green Belt boundaries will need to be established and set out in the masterplanning/design of the site.

Infrastructure

The allocated site is expected to contribute to the provision of infrastructure, through a variety of mechanisms (including s106 and s278 agreements, CIL and appropriate Planning Conditions).

The Infrastructure Delivery Plan that supports the Local Plan sets out a number of requirements for the delivery of this site, which is then identified in the policy wording for the site (HSG11). The infrastructure section of the policy sets out specifically where contributions to infrastructure would be sought. Some infrastructure is reliant on other sites to contribute to the provision of the infrastructure before it can be delivered. The phasing programme below considers the timely delivery of infrastructure and the housing to accord with the housing trajectory set out in the Council’s Housing Topic Paper (this will be updated following signed statements of delivery to reflect the most up to date information). The promoter reserves the right to comment on the revised Housing Topic Paper and revisit the Statement of Delivery if appropriate in due course.

Further, the Infrastructure Delivery Plan is a ‘living’ document and can be updated when additional information is received, i.e. through these Statements of Delivery, further discussions with infrastructure providers, s106 agreements and the delivery of a Planning Performance Agreement. The Infrastructure Delivery Plan also sets out where CIL should assist in funding certain infrastructure and the CIL Committee on 12 July 2018 approved a list of strategic projects that CIL should be spent on. As a result of the Local Plan, it is anticipated that the Council’s CIL will be reviewed following the adoption of the Local Plan.
Off Site

- Contributions towards the expansion and relocation of Pondtail GP Surgery to South Godstone; without the delivery of this infrastructure the site cannot be brought forward. This is due to discussions with the CCG that support a model for health hubs rather than GP surgeries being provided across the District.
- Contributions towards Junction 6 capacity improvements
- Contributions towards off-road cycle route along the A25
- Contributions towards off-road cycle route along the A22

The site’s representative has requested that wording for the off-site infrastructure requirements be amended. In particular they have requested that it be amended to state ‘the expansion and/or relocation of Pondtail GP Surgery to South Godstone or an appropriate alternative as agreed with the East Surrey Clinical Commissioning Group (CCG)’. They have noted that it is their understanding that the surgery is still accepting patients and furthermore they have not had the opportunity to explore with the CCG how demand for medical services from the site may be met.

However, the Council considers that the current wording should remain because discussions with the CCG have highlighted that it cannot expand and furthermore in order that the Garden Community can have a health centre, the only option available is for the relocation of an existing health centre. The site’s representative does not agree with this statement for the reasons listed in the paragraph above.

The site’s representative has requested that the references to contributions above be amended to state that only appropriate site related contributions (subject to detailed assessment) will be sought towards the listed infrastructure requirements. The Council has not accepted this change however, it would have it noted that, at the planning application stage, all contributions will be assessed in accordance with the relevant NPPF tests as set out in paragraph 56 (namely that they are necessary to make the development acceptable in planning terms; directly related to the development and fairly and reasonably related in scale and kind to the development) and the CIL Regulations. Where the applicant cannot fulfil the requirements, either in part or in full, detailed viability assessments should be prepared and submitted at the earliest stage of the application process.
**Phasing**

The projected delivery rates set out below are based upon the evidence and assumptions of Our Local Plan: 2033 and the work undertaken with infrastructure providers and key bodies.

The site's representative has requested that the phasing table below be amended to show delivery of 250 units. They also consider this site can make a contribution to housing supply within the first 5 years of the new Local Plan and have set out their projected delivery rates, which they state is based on commercial experience and appropriate phasing of contributions based on expected completions. This is shown in red in the table below, as are their proposed changes to the wording of infrastructure contributions.

TDC do not believe that the site can be delivered as early as 2021/2022 as the Local Plan is not due to be adopted until the end of 2019. Furthermore, TDC’s position is that this site cannot be brought forward before the delivery of the expanded and re-located Pondtail GP Surgery within the South Godstone Garden Community; the Garden Community is phased to commence delivery in 2028/2027. Moreover, a planning application would need to be submitted and the s106 would need to be agreed before the site could commence. For these reasons, TDC believe a more realistic timeframe for development would be 2028 – 2031.

The site's representative does not agree with the Council's statements regarding Pondtail Surgery, as set out above, and furthermore they have indicated that they consider 12-18 months from adoption of the Local Plan to be sufficient to obtain a planning permission and provide the appropriate level of infrastructure, as they have already undertaken the full suite of technical reports that would be necessary in order to make an application.
<table>
<thead>
<tr>
<th>10-15 years</th>
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<tbody>
<tr>
<td>2023/2022</td>
<td>50</td>
<td>Contributions to the relocation of PondTail Surgery</td>
<td>Junction 6 contributions</td>
<td>Off road cycle route along A25</td>
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<td>Contributions to off road cycle route along A25</td>
<td>Contributions to off road cycle route along A22</td>
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<tr>
<td>2020/2019</td>
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<thead>
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<tr>
<td>2023/2019</td>
<td>50</td>
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<td></td>
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</tr>
<tr>
<td>2022/2018</td>
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<tr>
<td>2021/2017</td>
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<tr>
<td>2020/2016</td>
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</table>

- **Total No. of Dwellings**: 150 (250)
- **Completion Date**: 2031 (2027)
- **URN**: HSG11
- **Development Name**: Land to the West of Godstone
- **Infrastructure provision**: 150 (250)
**Position statement**

This statement represents a formal position for both the Council and the landowner/promoter of the site as at the date of signing and confirms that all parties agree that the land identified and the appropriate infrastructure and contributions specified can be delivered.

**Signatures**

<table>
<thead>
<tr>
<th>Signed on behalf of Tandridge District Council</th>
<th>Signed by Peter Atkin of Pegasus Group as Agent on behalf of M &amp; G Real Estate</th>
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</thead>
<tbody>
<tr>
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</tbody>
</table>

Position: Chief Executive
Date: 10/12/18

Position: Associate Planner
Date: 14th December 2018
APPENDIX 4

FREEDOM OF INFORMATION REQUESTS
Dear Mr Atkin,

Freedom of Information Request reference 2016/FOI/2163

Thank you for your request for information.

The information you requested is as follows:

i) How many people are currently on the housing waiting lists for Tandridge as a whole?
   1233

ii) How many people are currently on the housing waiting lists within Godstone?

   42 housing applicants currently live within the village of Godstone

   93 housing applicants currently live within the Parish of Godstone (which also includes the villages of South
   Godstone and Blindley Heath)

I hope that this information is of assistance, however if you have any queries about this response, please contact
dgray@tandridge.gov.uk .

Please remember to quote the reference number above in any future communications.

The Council has a complaints procedure. A complaint should be made in writing to the Council’s Freedom of
Information Officer, James Hitchcock, or by e-mail to
freedomofinformation@tandridge.gov.uk<mailto:freedomofinformation@tandridge.gov.uk>. Further information
about the Council’s complaints procedure can be found on our website at
www.tandridge.gov.uk<http://www.tandridge.gov.uk>..

If you are still not satisfied after your complaint has been dealt with, you have a right to make a further complaint to
the Office of the Information Commissioner at FOI Compliance Team (complaints), Wycliffe House, Water Lane,
Wilmslow, Cheshire, SK9 5AF.

Further information may be found on the Information Commissioner’s website at
www.informationcommissioner.gov.uk<http://www.informationcommissioner.gov.uk>

Yours sincerely

Jayne Godden Miller
Chief Housing Officer
Please don't print this e-mail unless you really need to. Save paper.

Visit http://www.tandridge.gov.uk for information about services, online forms, payments and much more.

IMPORTANT: The contents of this email and any attachments are confidential. They are intended for the named recipient(s) only. If you have received this email in error, please inform the sender immediately and do not disclose the contents to anyone or make copies thereof.

This message has been scanned for viruses.
Good morning Mr Atkin,

I have been asked to respond to your FOI request questions;

1. How many people are currently on the housing waiting lists for Tandridge District as a whole? **1611**

2. How many people are currently on the waiting list within Godstone? **113** (I only counted the applicants with an active housing application).

Kind regards,

Matt

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**Protecting your data**

We know how important keeping your personal data secure and safe is. It's very important to us too. We only collect and keep personal information about you so we can provide the services you need, to help us keep details about those services and our contact with you. We will only share your personal data to help us provide services.