HEARING STATEMENT

On Behalf of Ashill (Respondent ID 996072)

Matter 3

September 2019
1.0 Introduction

1.1 On behalf of our client, Ashill, CBRE is instructed to submit Hearing Statements to the Tandridge District Council ‘Our Local Plan’ 2033 (July 2018) (hereafter ‘the Plan’).

1.2 Ashill has an interest in three sites within Tandridge that they have been promoting through the Local Plan process. These include:
   - GOD 001 – Godstone Reservoirs
   - CAT 019 – Caterham Reservoir
   - OXT 021 – Land west of Red Lane. This is Draft Site Allocation HSG13.

1.3 As discussed in more detail within the five Matter Statements (1, 2, 3, 4, 6), both omission sites (GOD 001 and CAT 019) are strategically located and offer a solution to the identified issues of soundness with the submitted plan. A separate Matter Statement has been provided in respect of the Inspector’s Questions for Site HSG13 which is allocated in the Plan.

1.4 GOD 001 and CAT 019 are both owned by Surrey and East Surrey Water, a major local employer within the wider area. Land west of Red Lane (OXT 021) is being jointly promoted by the two landowners, Surrey County Council and Ashill.

1.5 Ashill have previously made representations during the Our Local Plan: 2033 (Regulation 19) August 2018 and Local Plan: Garden Villages Consultation 2017. The representation references for this submission is 996072.
2.0 Matter 3 – The Spatial Strategy

QUESTION 3.2

Is the proposed distribution of housing and other development supported by the Sustainability Appraisal, and will it lead to the most appropriate pattern of housing growth?

Response

2.1 As set out within our response to Matter 1, within the work undertaken to inform the SA insufficient evidence is provided as to why only development options associated with a large urban extension/ garden village were considered as part of later stages of the SA. As set out in Paragraph 5.8.1 of Document MD5:

‘The SA is an iterative process and the 2015 options were based upon the understanding of the realistic options and evidence available at that time. However, the numbers within the 2015 options cannot be considered directly comparable to subsequent options 7a to 8b. The latter are based upon a more detailed and well-developed evidence base.’

2.2 All Options 7a – 8b in the 2018 SA include the development of a Garden Village. From the evidence base provided in the SA process there is insufficient reasoning as to how this has been considered against an alternative distribution for development that could result in further development in Tier 1 and Tier 2 settlements.

QUESTION 3.3

Is the distribution of new homes between the Tiers of settlements and proposed garden community justified and how has it been established?

Response

2.3 The Settlement Hierarchy Addendum (2018) (Document SBC1) is a key evidence-based document in the formulation of the settlement hierarchy for the Plan. Appendix 1 ‘Updated Scoring Table’ includes Godstone as the 4th most sustainable settlement yet it is included as a Tier 2 Settlement ahead of Limpsfield and Hurst Green which are ranked 11th and 6th respectively. In addition, Godstone’s sustainability score is identical to Warlingham which is identified as a Tier 1 Settlement.
2.0 Matter 3 – The Spatial Strategy

Whilst we consider that the growth apportioned to Limsfield and Hurst Green through the Plan is appropriate, the Plan does not reflect the capacity of Godstone and its position as a higher order settlement.

The distribution of housing allocations amongst the settlements is set out below.

<table>
<thead>
<tr>
<th>SETTLEMENT</th>
<th>ALLOCATIONS TOTAL</th>
<th>SETTLEMENT TIER</th>
</tr>
</thead>
<tbody>
<tr>
<td>Smallfield</td>
<td>305</td>
<td>Tier 2</td>
</tr>
<tr>
<td>Caterham</td>
<td>170</td>
<td>Tier 1</td>
</tr>
<tr>
<td>Godstone</td>
<td>168</td>
<td>Tier 2</td>
</tr>
<tr>
<td>Lingfield</td>
<td>60</td>
<td>Tier 2</td>
</tr>
<tr>
<td>Oxted</td>
<td>110</td>
<td>Tier 1</td>
</tr>
<tr>
<td>Warlingham</td>
<td>400</td>
<td>Tier 1</td>
</tr>
</tbody>
</table>

The Settlement distribution above is not justified by the evidence that underpins it. Smallfield is identified as the 7th most sustainable location in the district and scores 0 for ‘Access to the Strategic Road Network’ and ‘Railway Station’ yet it has the second highest amount of allocations. Similarly, in the Sustainability Matrix Warlingham and Godstone have an identical score yet Warlingham is allocated over double the amount of homes when compared to the Godstone – despite being affected by similar constraints.

Notwithstanding the above, the inclusion of Godstone as a Tier 2 Settlement also underplays the role that the area is seen to play in the future through the Surrey Place Ambition 2050 Document produced by Surrey County Council. As detailed on the below, Godstone and South Godstone is included as a ‘Strategic Opportunity Area.’
2.0 Matter 3 – The Spatial Strategy

Within the document Strategic Opportunity Area SO8 is identified as follows:

‘Strategic Opportunity Area 8 is located centrally within Tandridge District, the most easterly district in Surrey and an area that has a history of constrained development due to its rural nature and high percentage of Green Belt.

The strategic transport conduits of the M25, A22, A25 meet within the SOA and serve as fundamental access points for Surrey from neighbouring Sussex, Kent and Greater London to the north. These three strategic roads are well utilised by all modes of road transportation with vehicles often using it as an alternative route to Crawley, Gatwick, East Grinstead, Redhill and Reigate, especially when junctions further along the M25 are congested.

Such capacity issues present an obstacle to growth not just for Tandridge, but for Surrey as a whole and the wider South East limiting freedom of movement for businesses and residents. In order to overcome some of these issues a bid for more than £50 million was recently submitted to government by Surrey County Council, for Housing Infrastructure Funding (HIF) that would enable large scale strategic road improvements.

In order to try and address increasing needs for housing and infrastructure improvements the Council has set out planning policies to support a new community of 4,000 homes, strategic green infrastructure of over 100ha, employment provision and associated infrastructure at South Godstone. South Godstone Garden Community lies centrally in the district, on the A22, south of Junction 6 of the M25 and on the Tonbridge to Redhill train line. The new community is estimated an economic benefit of circa £127M and can open up a new, more affordable, market sector for the area.

A key strategic employment area at Lambs Business Park is in western remit of the SOA and has an established reputation as a successful industrial area. Future plans for the site are innovative and provide a key opportunity for the IT sector with plans for a data centre complex which would be powered by sustainable energy from waste facilities in accordance with the...
waste allocation proposed by Surrey County as the Waste Authority and contribute to the well-established economic profile of the County."
3.0 Main Modifications Required to Matter 3

3.1 In order to address the soundness issues identified in response to Matter 3 the following amendments are required to the Plan:

1. The proposed approach to site allocations in the Plan needs to be amended to reflect the evidence that underpins it. The outcome of this would be the redistribution of homes allocated to Smallfields to higher order settlements that are currently underrepresented - including Godstone and Caterham.