Land at Godstone Road/Longsdon Way, Caterham

Tandridge Local Plan – EiP Statement Matter 4
1. **MATTER 4: GREEN BELT BOUNDARY ALTERATIONS**

1.1 This statement has been prepared by Boyer on Behalf of Croudace Homes Limited, in response to the Inspector’s Initial Matters, Issues and Questions set for Matter 3 in relation to the Local Plan’s proposed Green Belt boundary alterations.

**Issue:** Is the Green Belt Assessment consistent with national planning policy for Green Belts, is it based upon appropriate criteria and is it adequate and robust?

Q4.1: Was the Green Belt Assessment undertaken on the basis of a clear methodology consistent with national planning policy for protecting Green Belts?

1.2 A key concern is that the sieving process by which promoted sites / parcels of land were considered in the Green Belt Assessment (‘GBA’) Part 1, and subsequently the GBA Part 2 and Part 3, is inconsistent with national planning policy. A number of sites which were identified in Part 2 of the GBA for consideration in Part 3, were subsequently omitted from consideration in Part 3. As we note below, the reasons cited for such are, in some instances, highly extraneous and unrelated to considerations relevant to the revision of Green Belt boundaries. The fact that some sites were not taken forward to Part 3 of the GBA, means that the GBA has not explored all reasonable options for Green Belt release and for meeting the Council’s Objectively Assessed Housing Need (OAN).

1.3 It is important that there is clear separation between the assessment of areas and sites for release from the Green Belt within the GBA and the subsequent assessment of whether these sites merit allocation for development. Part 3 of the GBA fuses these considerations. The GBA should primarily be concerned with whether a site meets Green Belt purposes and contributes to the openness of the Green Belt.

1.4 Where sites have been identified (as in Part 2 of this GBA) as not meeting any of the Green Belt purposes and making no contribution to the openness of the Green Belt, they should be removed from the Green Belt and then considered for allocation through a separate process.

1.5 For example, the GBA Part 2 states that;

“There is a small parcel of land between the built-up area of Longsdon Way and the A22 that seems to be an anomaly and it is not clear without further investigation why there is not development within the area, as the A22 would form a definitive boundary” (p. 38).

1.7 Examining the site in more detail, the GBA Part 2 concludes (categorically) that Site AA1, within Area for Further Investigation 009 (‘Land at Godstone Road’), does not serve any of the stated purposes of the Green Belt (as identified at NPPF 2012, Paragraph 80);
“This analysis area is isolated from the wider Green Belt, small in scale and remains undeveloped. Whilst it has served to contain development, due to its siting, scale and relationship with the urban area as well as the siting of the A22 along its eastern edge, this section of the Area is not considered to serve the [purpose 1] of preventing sprawl and [purpose 3] safeguarding from encroachment. Given the substantial separation from other settlements and distance from Conservation Areas, it does not serve purposes 2 [to prevent neighbouring towns merging into one another] and 4 [to preserve the setting and special character of historic towns] of including land within the Green Belt either. Being bounded by built form, including the A22, there is a sense of enclosure and containment that undermines the open character of the southernmost section of this Area for Further Investigation.” (p23).

1.8 Consequently, the GBA Part 2 recommends it be considered further to establish if exceptional circumstances exist to justify the release of this land.

1.9 Yet, this site, which the Council acknowledges makes no contribution to Green Belt purposes, and which is even described as an “anomaly” is then not considered in the ‘Green Belt Assessment (Part 3); Exceptional Circumstances and Insetting (2018)’. This document purportedly sets out to establish if there are exceptional circumstances to justify the release of particular sites from the Green Belt.

1.10 The reason this parcel is not considered further is indicated in the Sustainability Appraisal, which simply states that it was “Rejected – ecology”. However, as we note in our response to Matter 3, the Council’s consultant ecologist (‘The Ecology Partnership’ (‘TEP’)) advised the Authority that the site was capable of development and could facilitate biodiversity benefits. This is confirmed in the document ‘Site-Based Ecological Assessments; Rebuttals and Responses to Promoter Representations’ (TEP, July 2018);

“TEP’s assessment recognised that the site is in a broad location which, near existing development, appears to be appropriate for residential development, and notwithstanding the overall assessment of the site as “ecologically unsuitable”, TEP’s advice to Tandridge DC was that a small development might be possible if loss of calcareous grassland that is capable of restoration were minimised, and if a package of balancing measures were put in place to restore calcareous grassland across the site.”

1.11 The document then goes on to indicate that there is a question concerning what quantum of development could be achieved, relative to the extent of biodiversity enhancements that would be facilitated as a consequence. This is a matter that could have been resolved through informal discussions, with the exact scale of development being established through a future planning application. Yet the Council opted simply not to consider the site any further, including via the GBA Part 3.

1.12 The above example illustrates how the Council’s approach to the GBA conflates issues that are not relevant to Green Belt boundary revisions, with those that are, with this providing a pretext for discounting suitable sites from allocation. In this respect, the NPPF does not identify the protection of ecology as a Green Belt purpose, or otherwise suggest that such considerations merit a site’s retention within the designation. There is then no justification for
failing to properly evaluate the described site (through the GBA Part 3) to establish potential exceptional circumstances that may justify its release (noting that the described ‘anomaly’ site is located at a Tier-1 settlement and is situated within metres of Caterham Railway Station). The GBA, having been undertaken on this basis, cannot be consistent with national policy.

1.13 Further, NPPF (2012) Paragraph 85 indicates that when defining Green Belt boundaries Local Planning Authorities must;

- “ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development;
- not include land which it is unnecessary to keep permanently open;
- where necessary, identify in their plans areas of ‘safeguarded land’ between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period;
- make clear that the safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of safeguarded land should only be granted following a Local Plan review which proposes the development;
- satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period; and,
- define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.”

1.14 Through the Local Plan, the Council indeed proposes to define new Green Belt boundaries. Taking account of NPPF Paragraph 85 and the categorical findings of the GBA Part 2, there is no basis for keeping certain sites and areas ‘permanently open’. This is particularly so, where such areas have a clear and readily recognisable boundary, which is likely to be permanent and to which a revised Green Belt boundary should be aligned.

1.15 Indeed, in accordance with archived NPPF (2012) Paragraph 85 (and Paragraph 138 of the current Framework), such ‘anomaly’ sites should therefore be removed from the Green Belt irrespective of any proposed allocation. This would be consistent with Local Plan Spatial Objective SO12;

“Maintain a Green Belt within Tandridge that serves the policy purposes set out in the National Planning Policy Framework and ensure the Green Belt endures beyond the plan period.” (p34).

1.16 In relation to the above analysis, Site AA1, within Area for Further Investigation 009 (‘Land at Godstone Road’) is one of the sites where the basis for removal from Green Belt designation is compelling.

1.17 Such sites should then be considered for allocation particularly where there is potential for biodiversity enhancements and to contribute to wider sustainable development objectives.
Q4.2: In terms of paragraph 84 of the Framework, have the proposed alterations to the Green Belt boundaries taken account of the need to promote sustainable patterns of development and are they consistent with the Local Plan strategy?

1.18 No, the proposed alterations to the Green Belt fail to release suitable and sustainable sites at Caterham, a Tier 1 ‘Urban Settlement’ as identified in the ‘Settlement Hierarchy Paper’ (2015) and the 2018 update. For example, land at Godstone Road, which is identified in the GBA as not meeting Green Belt purposes, which adjoins the Caterham Valley settlement boundary and which lies approximately 400m from Caterham Railway Station and the Caterham Valley Town Centre, clearly falls within a sustainable pattern of development and is consistent with Local Plan strategy.

1.19 The land at Godstone Road provides an important example of the potential to provide sustainable patterns of development and ensure consistency with the Local Plan spatial strategy. The locational sustainability of this site is evident from Figure 1 overleaf.

![Figure 1](image)

1.20 In contrast, a number of sites that are proposed for release from the Green Belt, would appear to be comparatively unsustainable. For example, Land at Plough Road and Redehall Road, Smallfield, was identified (in the GBA Part 2) as contributing to Green Belt purposes. Likewise, in respect of sustainability considerations the GBA Part 3 states;
“...the site is not located within 600m from an area of public open space and does not have access to a secondary school. It is greenfield and its development would be expected to lead to the loss of soil. There would be a reliance on car travel to travel to Crawley and Horley, which have a broader range of facilities and for commuting purposes; if developed, sustainable transport measures and electric charging points would need to be encouraged. The site may not meet the Landscape Character Area guidelines to ‘conserve and enhance the landscape setting to villages and edge of settlement’, whilst adversely affecting the Ancient Woodland that is interspersed throughout the Smallfield area. The site is on the urban edge of Smallfield and has the potential to adversely affect the various Grade II listed buildings in the village."

1.21 The approach to Green Belt alterations therefore appears to be inconsistent with the national policy requirement to contribute to sustainable patterns of development.

Q4.3: Have all realistic alternatives to releasing land from the Green Belt been considered, such as further development in the urban area or increasing development densities, and would the most efficient use of land proposed for release from the Green Belt be made?

1.22 There are no realistic alternatives to releasing Green Belt land within Tandridge. As the Foreword to the Plan indicates, 94 percent of land within the District is washed over by the Green Belt. Plan-wide (in-principle) ‘exceptional circumstances’, justify the release of Green Belt land, in order to meet identified housing needs and address affordability issues. It is therefore inevitable that Green Belt land is released in order to meet the Plan’s wider objectives and address national policies.

1.23 It is also relevant that the supply of brownfield land in Tandridge is limited. Many former industrial and commercial sites (within the main settlements) have already been redeveloped. Likewise, it is notable that the overwhelming majority of sites identified on the Tandridge Brownfield Register have been granted planning permission. The Plan also proposes to allocate a number of previously developed sites or sites which include a significant previously developed element. These proposed allocations are identified as contributing approximately 270 dwellings to the supply of houses identified in the Plan. Set against an identified OAN of either 7,960 or 9,400 dwellings, it is clear that significant releases from the Green Belt are required.

1.24 Additionally, although we maintain that the identified OAN can and should be met in full, this should not be achieved through the wholesale re-allocation of viable employment land for housing development. This would not be consistent with proposed Spatial Objective SO1 and (as the Plan notes at paragraphs 21.5 to 21.7), several existing employment sites within Tandridge (whilst suitable for commercial activities) are not sustainably located for the purposes of residential development.

1.25 The Plan also seeks to promote an efficient use of land through development management policies. In this respect, Policy TLP19 proposes that ‘all developments must make the most efficient use of land to ensure a sufficient supply of homes, for the benefit of the wider
Development densities have also been considered through the ‘Tandridge District Council Urban Capacity Study’ (2017), which seeks to map a set of ‘density characters areas’ in relation to the proposed allocations.

1.26 Achieving higher levels of density and an efficient use of land is a desirable objective (and consistent with paragraphs 122, 123 and 137 of the NPPF, 2019). However, it is also notable that many representations submitted to the Regulation 19 consultation, called into question the increased development densities assumed in the Urban Capacity Study and the site-specific polices associated with the proposed residential allocations. As such, the extent to which ‘densification’ provides an alternative to Green Belt release in Tandridge is limited.

**Q4.4: Is the site selection methodology for sites to be released from the Green Belt robust and are the proposed alterations to the Green Belt boundaries justified?**

1.27 As indicated previously, the approach to the selection of sites is inconsistent. The GBA (Parts 1 and 2) identifies sites that are both sustainable and which make no meaningful contribution to Green Belt purposes. Yet, these sites are not then considered in the GBA Part 3, and therefore potential exceptional circumstances that might justify their release from the Green Belt are not explored. Conversely, sites that are identified (in the evidence base) as being less sustainable and making significant contributions to Green Belt purposes are proposed for allocation and release. This approach fails to contribute to sustainable patterns of development and is therefore inconsistent with achieved NPPF Paragraphs 84 and 85. It also results in a Plan that is not justified by the supporting evidence base and which is not positively prepared.

To address these issues, it will be necessary to ensure that all sites recommended to progress to the GBA Part 3 are assessed fully. Likewise, the GBA Part 3 should be revised in order that there is definitive separation between the assessment of areas for release from the Green Belt and a subsequent (separate) evaluation of whether these sites merit allocation for development. This more rigorous approach will ensure that every opportunity to meet housing needs is fully explored.

**Q4.5: In overall terms, are there exceptional circumstances for the proposed alterations of the boundaries of the Green Belt, to accommodate the level development proposed?**

1.28 There are clear Plan-wide exceptional circumstances which justify alterations to the Green Belt. This would be the case if the Plan were to be tested against either the 2012 or 2019 versions of the NPPF.

1.29 Having regard to the Calverton Judgment (EWHC 1078), the proposed OAN of 7,960 dwellings over the Plan-period (or 398 dwelling per annum) significantly exceeds the housing requirement identified in the current Development Plan (2,500 dwellings or 125 dwellings per annum). The acuteness of housing need can therefore be said to be ‘severe’.

1.30 In addition, we maintain that the proposed OAN has in fact been significantly underestimated. If a higher OAN is identified through the Examination, then the degree to
which Plan-level exceptional circumstances can be demonstrated will be even greater. We refer the Inspector to the Tandridge Forum’s response to Matter 2 for further details of our concerns regarding the OAN identified in the Plan.

1.31 None of the duty-to-cooperate partners have identified a capacity to assist Tandridge in meeting its housing need. Indeed, neighbouring Authorities are similarly constrained by Green Belt and other restrictive designations. The failure to address housing needs in the Tandridge District will therefore act to compress household formation rates and lead to a further worsening of affordability. As such, there is no option but to meet identified needs through the Plan and within the District.

1.32 As indicated, when searching for available land within Tandridge, it becomes readily apparent that the supply of brownfield is limited and the Council has sought to allocate sustainably located previously developed sites for residential development. The Plan also proposes policies that seek to intensify development densities, particularly in urban locations. Even with these measures, it would be impossible to address housing needs without releasing land from the Green Belt.

Q4.6: In overall terms, are the proposed boundaries of the Green Belt defined clearly and would they be likely to be permanent or capable of enduring beyond the plan period?

1.33 No, for the reasons explained, the Green Belt boundary pertaining to land at Godstone Road is described as an “anomaly” in the GBA Part 2. The GBA also confirms that the land does not contribute to the identified purposes of the Green Belt, and the Council’s ecological evidence indicates that development could be achieved upon it. The GBA also states that the A22 road to the east would provide a logical, defensible and permanent boundary. It is therefore all but certain that the Green Belt boundary in this location will be amended in future (to align with the A22), even if it is not amended in the Local Plan 2033. For this site to be retained in the Green Belt would therefore be inconsistent with Paragraph 85 of the archived (2012) NPPF or Paragraph 138 of the current (2019) Framework.