Montagu Evans on Behalf of The British Home, Macmillan Cancer Support, The Royal Alfred Seafarers’ Society, Royal Society for Blind Children and the Royal National Lifeboat Institution (‘The Charities’) & Welbeck Strategic Land

Written Submission to Tandridge District Council Local Plan Examination

Matter 4: Green Belt Boundary Alterations

6 September 2019

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## APPENDICES

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1.0 RESPONSE TO INSPECTOR’S INITIAL MATTERS, ISSUES AND QUESTIONS: MATTER 4: GREEN BELT BOUNDARY ALTERATIONS - 24 JULY 2019

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?

4.3. 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?

1.1 The Council undertook an Urban Capacity Study in 2017 which sought to identify additional brownfield sites that had not been included in the Housing and Economic Land Availability Assessment process and to assist in optimising densities across settlements to boost delivery. Of the sites identified within the study, 3 have been proposed to be allocated in the Local Plan providing 75 dwellings. The study however reinforces the findings that only a very limited amount of brownfield land supply is available in the District.

1.2 The draft Local Plan allocations for housing sites that are proposed to be released from the Green Belt should seek to optimise the delivery of housing. As set out in our Written Statement for Matter 6: Housing Allocation HSG16, we do not consider this to be the case. As an example, draft site allocation HSG16 is identified in the emerging Local Plan as having a site capacity of 50 units, however our Regulation 19 Representation demonstrates that at least 92 units could be delivered on this Site. Whilst we acknowledge that indicative site capacities are used at this stage to inform the housing trajectory, draft allocation HSG16 should be amended so that the site capacity is a minimum of 92 units, to reflect the optimum density and additional capacity that it can deliver.

1.3 Beyond this, Document HNS2 explains the reasonable alternatives considered by the Council to deliver additional housing. This includes the release of more Green Belt land for housing sites in and adjacent to existing urban areas such as Tier 1 and Tier 2 settlements, more housing sites in rural areas within the Green Belt and the construction of a second garden community. These alternatives were discounted as they were not considered to be realistic or sustainable; the primary justification behind this being that these alternative sites were primarily located within the Green Belt. This somewhat arbitrary approach fails to properly grapple with the requirements of the NPPF that clearly envisages the release of Green Belt land in exceptional circumstances. The very significant shortfall in meeting the Council’s full Objectively Assessed Housing Need (OAN) is in our view one such exceptional circumstance.

1.4 This is further reinforced through the Duty to Cooperate responses from Crawley, Guildford, Mid-Sussex, Mole Valley, Sevenoaks and Wealden, which confirm that the adjacent Local Authorities to TDC are unable to assist in the delivery of unmet need outside of the district and it is therefore incumbent on the Council to meet their OAN within their HMA.
With no other realistic alternative to meeting its OAN, it is therefore very clear, that the most realistic and feasible option for the Council is through the release of additional Green Belt land. This would require a full and proper Green Belt assessment. We consider that the Green Belt assessment which forms part of the Local Plan evidence base is flawed. As an example, Green Belt Part 2 (document GB5 of examination library) site reference GBA Area 003 is concluded to serve purposes 1, 2 and 3 of the Green Belt, as set out in Paragraph 80 of the NPPF. This however is considered to be an incorrect conclusion as evidenced in the Regulation 19 Representations submitted by Montagu Evans (Appendix 1).

It is considered that the flaws within the Green Belt Assessment can be resolved swiftly through a full and proper assessment that should seek to identify appropriate locations for alterations to the boundary to allow for additional land to be allocated for housing. In line with the draft Plan spatial strategy, this should focus on land around existing urban areas such as Tier 1 and Tier 2 settlements.

4.4. 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?

The proposed alterations to the Green Belt boundaries and the site selection methodology for sites to be released from the Green Belt is not considered to be robust. It is clear from the evidence base that there are additional deliverable sites that make a limited contribution to the function of the Green Belt, not identified for Green Belt release, that are available now, are deliverable and are located sustainably in terms of meeting housing needs.

The Council’s Housing and Economic Land Availability Assessment (HELAA) (2017-2018) sets out the sites put forward for consideration. Many were excluded from being taken forward for housing within the draft Local Plan. A robust justification for the exclusion of the majority of these site has not been provided to date.

An example of this is HELAA ref. WAR 008. This comprises land north of Greenhill Lane, Warlingham. The site accorded with the Council’s preferred strategy of identifying and allocating suitable sites on the edge of urban and semi-rural settlements as it is immediately adjacent to Warlingham, a Tier 1 settlement. The site was considered to be developable and capable of coming forward after 5 years, should the site be allocated in the Local Plan. The site however was excluded within the Tandridge District Council – Local Plan: Sites Consultation Regulation 18 document on the basis that that the site possesses “a low capacity to accommodate development on landscape grounds”.

No further justification was provided despite landscape evidence to the contrary being submitted as part of the Regulation 18 (Appendix 2) and Regulation 19 representations that robustly justified that the Council’s assessment of landscape value was flawed in some critical aspects and that a sensitive redevelopment of the site would provide significant elements of landscaping and open space, alongside a significant quantum of new housing.
1.11 The Council’s Green Belt Assessment Part 2 (GB5 of the Examination Library) concluded that the site served function 1, 2 and 3 of the Green Belt. However, the representations submitted did not agree with this conclusion and robust justification was submitted to the contrary. This is further evidence that the Council’s methodology is flawed insofar as it doesn’t provide a robust evidence base against further Green Belt release.

1.12 The site selection methodology for sites to be released from the Green Belt is therefore not considered to be robust. It is clear that the release of additional Green Belt land is required for the Council to meet their OAN and that the most appropriate sites that should be considered for release are sites such as WAR 008, which is deliverable and developable now and accords with the Council’s preferred strategy of being located near tier 1 and tier 2 settlements.

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

1.13 Paragraph 47 of the NPPF states that it is incumbent on Local Authorities to meet their full, objectively assessed need for housing within the housing market area. These are clearly exceptional circumstances that justify the proposed alterations to the boundary of the Green Belt, consistent with Paragraph 83 of the NPPF.

1.14 Whilst we agree with the proposed alterations to the Green Belt boundary to accommodate the development proposed, clearly, the exceptional circumstances of meeting the identified OAN above warrant the release of more land. As it stands, the Council propose a housing supply over the plan period of 6,056 homes. This figure falls significantly short of the OAN set out within the Publication Plan of 9,400 new dwellings and the OAN of 7,960 new dwellings set out in document HNS5. It is clear that the plan cannot be considered sound without the release of additional Green Belt land to meet the identified OAN.
Appendix 1.0
Regulation 19 Representations
10 September 2018

Planning Policy
Tandridge District Council
Council Offices
8 Station Road
Oxted
Surrey
RH8 0BT

Dear Sir or Madam

TANDRIDGE DISTRICT COUNCIL – DRAFT LOCAL PLAN CONSULTATION
LOCAL PLAN: 2033 REGULATION 19 REPRESENTATION

Montagu Evans have prepared these representations on behalf of a consortium of charities comprising The British Home, Macmillan Cancer Support, The Royal Alfred Seafarers’ Society, Royal Society for Blind Children and the Royal National Lifeboat Institution, thereafter referred to as “The Charities”. The representations are also on behalf of The Charities selected development partner Welbeck Strategic Land.

The Charities are the freehold owners of two strategic development sites situated in Warlingham. On behalf of the Charities, Montagu Evans have been proactively engaged in the ongoing Local Plan making process. Through these historical representations the consortium have been given Comment ID’s 3339 and 3340.

Detailed representations and evidence was submitted in relation to the Site Allocations document (Regulation 18) which was consulted on between 4 November 2016 – 30 December 2016. The proposed sites are identified in The Local Plan: Sites Consultation document as Land north of Greenhill Lane (WAR 008) and Land south of Greenhill Lane (WAR 011). Most recently, further representations were submitted in relation to the Regulation 18 Local Plan: Garden Villages consultation document which was consulted on between 14 August 2017 – 9 October 2017.

This representation responds to the Council’s Regulation 19 consultation in relation to the Local Plan: 2033 document which runs until 10 September 2018. Specifically:

- We support the draft allocation of land at Greenhill Lane and Alexandra Avenue, Warlingham (WAR011) – allocated as HSG16 within the Local Plan:2033 Regulation 19 document alongside WAR023; and
- We object that land north of Greenhill Lane, Warlingham (WAR 008) should be discounted and not considered appropriate for development moving forward.
THE LOCAL PLAN 2033: REGULATION 19 DOCUMENT

A. Objectively Assessed Housing Need

Paragraph 214 of the Revised National Planning Policy Framework (July, 2018) states that where a Local Plan is submitted to the Secretary of State on or before 24 January 2019, it will be considered against the polices contained within the previous Framework. As such, the draft Local Plan: 2033 Regulation 19 is considered below against the previous Framework policies in terms of the test of soundness. As currently submitted the relevant tests of soundness are those prescribed by Paragraph 182 of the NPPF (2012). For a Local Plan to be considered sound it must be:

- **Positively prepared** – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent in achieving sustainable development;
- **Justified** – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
- **Effective** – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
- **Consistent with national policy** – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.

These are in any event broadly consistent with those in paragraph 35 of the new NPPF.

However, for the reasons set out below we believe the draft Plan as currently drafted is critically flawed and can only be found to be unsound. Consequently, having addressed these flaws and resubmitted the Plan, it will fall to be determined under the policies of the new NPPF. Accordingly, where appropriate we also have regard to the new NPPF as this sets the clear direction of travel for planning over the Plan period.

For the avoidance of doubt all references to the NPPF are taken from the 2012 version unless specifically identified otherwise.

To boost significantly the supply of housing, the NPPF requires that local planning authorities should use an evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area; including identifying key sites which are critical to the delivery of the housing strategy over the plan period (paragraph 67).

Local authorities are required to have a clear understanding of housing needs in their area through preparation of a Strategic Housing Market Assessment (SHMA) and a Strategic Housing Land Availability Assessment (SHLAA) (paragraph 159).
Within the draft Local Plan: 2033, Policy TLP01 (Spatial Strategy) states that the housing delivery over the local plan period will be 6,056 homes. This equates to 404 dwellings per annum.

In the Council’s SHMA 2015, the Objectively Assessed Housing Need (OAN) in the period 2013-2033 is calculated at 9,400 new homes, equating to 470 dwellings per annum (dpa). We note that the NPPF (2018) introduces a new standard methodology for identifying local housing need within the NPPG. The draft methodology currently shows that for Tandridge DC the OAN will increase to 12,900, increasing the annual housing need to 645 dpa over a 20 year period. This is an increase in the OAN of 37%.

We note that the intention is to consider adjusting the method after household projections are released in September 2018, however if this approach is to be adopted going forward, the potential housing need within the district would be severely underestimated in the context of this new formula set out by DCLG. We believe it is material to consider the Plan in these terms for reasons stated above.

The current Plan is based on delivering total housing of 6,056 units, 404 dpa. Even adopting the NPPF requirements it is therefore clear that the draft Local Plan cannot be considered sound on the basis that the Council have not allocated enough sites within the draft plan to provide for all of the identified housing growth over the plan period, with headroom to reflect the affordability problems in the district. This is a critical and fundamental flaw that would see the Plan fall at the first hurdle.

Given the acknowledged Green Belt constraints, with 94% of the District located within it, is very clear that the Councils OAN can only be met through the release of land within the Green Belt. It is clear from the available evidence base that such release has not been properly considered. To the contrary whilst it is proposed that some Green Belt land is released, it has on the whole been used as ‘justification’ as to why sufficient land cannot be allocated. This approach is contrary to the policy within the NPPF which clearly envisages changes to the Green Belt boundary through the Plan making process where exceptional circumstances exist to justify release. In particular there is a need to properly assess whether allocated Green Belt sites continue to serve the five stated purposes of such land and this has not been sufficiently done as part of the Green Belt review which forms part of the evidence base for the draft Local Plan.

The NPPF also requires that when reviewing Green Belt boundaries, LPAs should take account of the need to promote sustainable patterns of development with development channelled towards urban areas in the Green Belt, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary (Paragraph 84). Given Tandridge’s Green Belt position this directs the Green Belt boundary review towards towns and villages inset within the Green Belt.

For the purposes of this submission this self-evidently includes Warlingham, particularly its Tier 1 status in the settlement hierarchy. We explain below why in the context of this policy position it is appropriate to release not only WAR011 but also WAR008 to ensure that the Districts development needs are met in a highly sustainable manner fully compliant with the tests set by Paragraph 85 of the NPPF.
B. Vision

We do not object to the principle of a Garden Village as part of a comprehensive strategy to help meet the identified housing needs of Tandridge District, however, this is subject to the identified site being available and deliverable in the timescales required for the plan period. The draft Local Plan: 2033 Policy TPL01 sets out that the preferred garden village location, ‘South Godstone Garden Community’, has the capability to deliver 1,400 units over the Plan period, with a further 2,600 homes intended to be delivered from the garden village beyond the Plan period. From experience the earliest a Garden Village will start delivering residential units from a standing start is 7-8 years.

Notwithstanding the likely timescales before the proposed garden village will start to deliver residential development, the majority of the housing within the garden village would be delivered beyond the Plan period. It is clear from the above that the Council need to develop a more robust strategy to account for the anticipated under-delivery of housing from the proposed garden village both in the short – medium term and over the Plan period.

C. Housing Delivery and the Council’s Approach

Turning to short term housing delivery (i.e. within the first 1-5 years of the emerging plan period), the Council needs to deliver approx. 2,350 new dwellings to provide for the identified housing demand set out within the objectively assessed annual housing need contained in the Council’s SHMA 2015.

Draft Local Plan Policy TPL01 states that housing demand in the short to medium term (i.e. within years 1-10 of the local plan) development will be directed toward Tier 1 (urban) and Tier 2 (semi-rural service settlements) settlements. Draft Policy TLP01 identified a capacity over the plan period for Tier 1 (including Town Centre Initiatives) and Tier 2 settlements of 1,551 residential units. However, based on the OAN within the Council’s SHMA 2015, the Council will need to allocate sufficient land to facilitate for an additional 799 dwellings within the first 5 years of the Local Plan alone, notwithstanding years 5-10.

Furthermore, the allocation of a garden village within South Godstone, while supported in principle, will eventually lead to a disproportionate delivery of housing (circa. 4,000 units) concentrated within the south of Tandridge District Council at the later stages of the emerging local plan. To ensure equitable and proportionate housing delivery across Tandridge for the duration of the emerging Local Plan period, having regard to the full OAN, additional land should be allocated for housing delivery in the north of the district, in line with the Council’s preferred strategy.

It is clear that the allocation of additional land for housing development around Tier 1 settlements in the north of the district is required to provide sufficient land for short-term housing delivery within the local plan and ensure that housing delivery is proportionate for the duration of the emerging Local Plan. The release of additional suitable, deliverable Green Belt sites in Tier 1 settlements can significantly contribute toward addressing this fundamental Local Plan flaw.
D. Proposed Sites

Land at Greenhill Lane and Alexandra Avenue, Warlingham (HSG16)

The above Site is allocated within the draft Local Plan:2033 for residential development under reference HSG16. This allocation includes land previously identified as WAR011 and WAR023. The draft local plan site allocation states that:

- The exceptional circumstances to justify the release of this site from the Green Belt boundary have been identified and the site is put forward for removal from the Green Belt;
- Any development proposals on the site should provide a mix of market housing and extra care accommodation; and
- The site has an estimated yield of 50 units.

The draft allocation HSG16 for the above Site is supported. Indeed the Vision Document prepared by Adam Architects (Appendix 1) demonstrates how this site can be brought forward in a manner that can exceed the current draft allocation. The Vision Statement demonstrates that WAR 011 is capable of delivering circa. 50 units while WAR023 could deliver circa. 42 units.

We are in ongoing discussions with the land owners of the adjoining site WAR023 and would hope agreement can be reached that allows the sites to be promoted comprehensively. Notwithstanding this, the Vision Document also demonstrates how WAR011 could come forward in isolation consistent and without prejudice to the wider allocation objectives.

Land North of Greenhill Lane (WAR 008)

This site can make a significant contribution towards addressing the fundamental flaws within the emerging Local Plan, as set out above. However, the draft Local Plan:2033 does not propose to allocate this site as appropriate for housing development. We note that no additional evidence has been prepared by the Council (beyond that accompanying the previous drafts of the Plan) to support the decision to exclude the above site from the draft Local Plan Regulation 19 document.

As such, this representation responds to the grounds for exclusion set out previously by the Council, specifically, that the site possesses “a low capacity to accommodate development on landscape grounds.”

Turning to each of pertinent local plan technical evidence base documents.

- Housing and Economic Land Availability Assessment (HELAA) (2017- 2018)
The site accords with the preferred strategy as it is immediately adjacent to a Tier 1 settlement and it was considered to be developable and capable of coming forward after 5 years, should the site be allocated in the Local Plan.

The site was given an estimated yield of 320 residential units, which equates to an average of 10 dwellings per hectare.

We disagree with the estimated site capacity. The submitted Vision Document prepared by Adam Architects presents a robustly informed indicative residential scheme for the site which considers the surrounding character and context in the immediate area. This document demonstrates that the site has the capacity to deliver circa. 550 residential units. This is considered to be an appropriate estimation of the site capacity, reflective of surrounding development. Indeed it is incumbent to optimise the development potential of released sites having regard to the sites characteristics.

The key principles of the proposed concept masterplan within the submitted Vision Statement have been shaped by an analysis of the form and quality of surrounding towns and villages. The proposed concept masterplan seeks to incorporate the identified features that provide character, including a village green, a market square and a recreational common.

The scale of the site also provides opportunities to deliver appropriate services within the area, alongside significant green infrastructure enhancements which could be utilised by existing and proposed residents. The concept masterplan also provides the opportunity to establish a clear and defensible boundary to the Green Belt in this location. The concept masterplan proposes strategic landscape buffers to each boundary of the site, utilising physical features such as mature trees and hedgerows fronting green buffers. This would present a clear and permanent demarcation that would define a recognisable boundary between the urban area and Green Belt, in accordance with Paragraph 85 of the NPPF.

- **Green Belt Assessment**

Within the Green Belt Assessment Part 2 (October, 2016), WAR 008 was not fully assessed as not all of the site falls within the nearest assessed area, Area 003. Further, the area that was assessed is significantly wider than the extent of WAR 008 and encompasses many different typologies of land.

In relation to Area 003 the Council have stated the following:

- Historically, the part of the Area now known as Great Park served as a hospital and redevelopment was allowed on appeal on the basis that it would not have any greater impact upon the openness of the Green Belt. The redevelopment represents a notable level of development within the Green Belt and can be viewed as encroachment upon the countryside. We note that the Clock Tower, which sits in the centre of the Great Park development, is visible from WAR 008.
In the light of this, and the age of built form within this Area, the assessment states that the Green Belt has prevented further sprawl of built-up areas and encroachment into the countryside.

Chelsham is a settlement although it has no services and has a dispersed character, aside from Great Park. It is considered that the wider area serves effectively in preventing Warlingham from merging with Chelsham.

In addition to serving purposes 1 and 3, this area effectively serves Green Belt purpose 2 in preventing Warlingham from merging with Chelsham.

Furthermore, the character of this Area for Further Investigation remains open and undeveloped in its appearance.

In the light of the above, the Council concludes that this Area should not be considered further as part of the Green Belt Assessment.

On the basis of the above assessment the Council considers that WAR 008 is located within an area of Green Belt that effectively serves the purposes of including land within it. Specifically, they consider that WAR 008:

1. prevents the unrestricted sprawl of large built-up areas;
2. prevents neighbouring towns merging into one another (Warlingham and Chelsham); and
3. assists in safeguarding the countryside from encroachment.

We disagree that WAR 008 serves purposes 1 and 3. The site is surrounded by development on all sides with development along Farleigh road to the west, Greenhill Lane to the south, Harrow Road and Great Park to the north and Chelsham to the east. The site effectively sits as an island surrounded by the existing built development that makes up the settlement of Warlingham. It does not prevent sprawl nor does it safeguard from encroachment.

Further, the site does not provide or form part of a defensible boundary to this part of the Green Belt. A more defensible boundary could be provided along Chelsham Road through the release of the site for redevelopment and appropriate masterplanning.

We also disagree with the Council’s conclusion in relation to purpose 2. Chelsham is a very small settlement which the Council describe in the GBA Part 2 as having no services and a dispersed character. It is not a neighbouring town and is already part of Warlingham through the Great Park development and residential dwellings along Harrow Road. It is already very difficult to distinguish a boundary or separation between Chelsham and Warlingham, with no distinct or clear demarcation between the 2 settlements as existing. The submitted Vision Document demonstrates that the development of WAR008 for housing will not increase physical or visual coalescence of these two settlements which would be achieved through the incorporation of significant landscape buffers and retaining mature hedgerows and trees as part of the site boundary.

Accordingly, we request that the Council reconsider their position and conclude that WAR008 does not continue to meet the five stated purposes of Green Belt land. The alteration of the Green Belt boundary to include WAR008 is considered to constitute exceptional circumstances on the basis that the draft Local Plan would not be found
sound due to the significant lack of allocated land to provide for identified housing growth over the emerging plan period. Development of WAR008 can make a significant contribution toward achieving identified housing delivery over the emerging Local Plan period and would not prejudice the future function of the Green Belt within Tandridge. As such, it is an entirely appropriate location to be released and brought forward for development.

- **Landscape Capacity for Development**

The Council’s main stated reason for not taking WAR 008 forward is that in their opinion it has “a low capacity to accommodate development on landscape grounds.” This opinion is based on evidence set out in their Landscape Capacity and Sensitivity Study (2016) (LCSS).

The Council considered that the site is sensitive due to its inconsistency with the existing settlement form / pattern, its contribution to the separation with Chelsham and its low potential for successful mitigation.

A detailed response to the Council’s assessment was submitted previously as part of the Local Plan: Sites Consultation. This response included a detailed appraisal of the landscape and visual sensitivity and value of WAR 008 prepared by Scarp. For completeness, this has been included as part of these representations (Appendix 2).

The findings within Scarp’s appraisal were;

1. the LCSS assessment is flawed in some critical aspects; and
2. that the WAR 008 site has a much greater capacity to accommodate development on landscape grounds than reported in the LCSS.

Within Section 5 of Scarp’s appraisal an analysis was provided on the WAR 008 assessment findings. Scarp have attributed scores to each of the assessment criteria used in the LCSS for determining landscape sensitivity and landscape value. Reasoned justifications are provided where the Scarp assessment scores differ from those identified in the LCSS. This is considered in more detail below.

- **Landscape Sensitivity**

In terms of landscape sensitivity, the LCSS has given the WAR 008 site an overall landscape sensitivity judgement of Substantial, scoring 23 out of 35 and falling just within the Substantial range of 22–28.

Scarp considers that the sensitivity of the site landscape has been overestimated, primarily on account of the LCSS;

i. not identifying housing along Farleigh Road as part of Warlingham;
ii. not fully identifying the relationship between settlement pattern and topography; and
iii. not fully recognising the significant potential for mitigation available through sensitive development master-planning.

Scarp has given an overall landscape sensitivity judgement of Moderate, scoring 18 out of 35 and falling within the Moderate range of 15-21.

- **Landscape Value**

In terms of landscape value, the LCSS has given the WAR 008 site an overall landscape value judgement of Moderate, scoring 15 out of 35 and again falling just within the Moderate range of 15-21.

Scarp has given an overall landscape value judgement of Slight, scoring 13 out of 35 and falling within the Slight range of 08-14.

The difference in scoring relates to an over-estimation of the scores for ‘Local Distinctiveness’ and ‘Recreation and public assets / locally valued spaces’ in the LCSS assessment.

Within the Vision Document Scarp have further assessed the redevelopment opportunity afforded by the site in terms of landscaping opportunities. The proposed concept masterplan would provide significant elements of landscaping and open space. To the southern boundary of the site, a green corridor is proposed and an enhanced green connection is proposed along the north east boundary. The proposed development is set back from the boundary through incorporating these green buffers and retaining mature trees and hedgerows along the site boundary maintaining local landscaping distinctiveness.

- **Ecology**

A site-based ecology assessment forms part of the Vision Statement submitted with this representation. The assessment concludes that the site has limited ecological potential, with the boundary hedgerows presenting the features of greatest ecological value. The proposed indicative site layout illustrates that the hedgerows and mature trees along the site boundary would be largely retained, with minor exceptions where access to the site is proposed. To minimise any ecological impact, the boundary hedgerows and trees would be buffered from any development with areas of open and green space.

The proposed indicative layout demonstrates that the proposals could incorporate a significant amount of open green space while delivering housing development.

Overall it is considered that the proposed development allows for significant opportunities for ecological and biodiversity enhancements post development and protects the features of greatest value.

- **Summary**

The Council’s evidence base and its assessment of WAR 008 is flawed in some critical aspects.
The detailed appraisal carried out by Scarp concludes that the sensitivity of WAR 008 has been over-estimated. The Council have erroneously given WAR 008 an overall landscape sensitivity judgement of Substantial, scoring 23 out of 35. Scarp’s more detailed appraisal shows that the sensitivity judgement should be Moderate, with a score of 18 out of 35.

In terms of landscape value of the WAR 008 site, the LCSS has over-estimated scores in relation to ‘Local Distinctiveness’ and ‘Recreation and public assets / locally valued spaces’. Scarp has given an overall landscape value judgement of Slight, scoring 13 out of 35 against the LCSS judgement of Moderate and score of 15 out of 35.

Accordingly the landscape capacity of the WAR 008 site is Medium / High capacity rather than the Low capacity assessed in the LCSS and incorrectly relied upon in the Sites Consultation Document.

On this basis, we consider that the Council’s exclusion of this site from the Local Plan on the basis of landscape value and serving the Green Belt function to be defective. As such it is proposed that the site is allocated for housing development in line with the Vision Statement submitted as part of this representation.

**E. Highways And Transport**

A highways, accessibility and transport assessment has been undertaken by iTTransport as part of the Vision Statement submitted with this representation. The assessment identifies existing sustainable transport modes in close proximity to the sites, including local bus routes and the nearby Upper Warlingham Train Station and Whyteleafe South / Whyteleafe Train Station. Any future planning application would assess the potential for improving public transport in the local area to benefit existing and future residents.

Regarding site access to WAR008, the Vision Statement demonstrates that the main site access would be from a fourth arm from an improved Farleigh Road / Sunny Bank roundabout to the south west and Harrow Road to the north east. A secondary vehicular access from Chelsam Road to the east and Harrow Road to the north is also proposed. Access to WAR011 and WAR023 is proposed from Chelsam Lane to the south with a route through the site and egress onto Greenhill Lane.

An assessment has been undertaken regarding the suitability of these proposed access and egress points which has concluded that safe and suitable access can be provided to the sites in all of the proposed locations, meeting the design specification of local and national highway guidance.

Regarding traffic impact, the assessment concludes that while the proposed development would lead to an increase in traffic on the local highway network, the proposed access strategy would suitably disperse development generated traffic on the wider local highway network to ensure no unacceptable impacts would arise from development of the sites. As part of any planning application, an assessment of the local highway network would be undertaken to identify whether the proposed development could fund or deliver highway improvements to further mitigate any potential impact from development of the site.
F. Closing

In its current format, the draft Local Plan is fundamentally flawed in that the Council have not allocated enough sites within the draft plan to provide for all of the identified housing growth over the plan period. The Council do not provide any sound or robust rationale for why this need cannot be met. For this reason, the draft Local Plan cannot be considered to be positively prepared or justified when assessed against paragraph 182 of the NPPF. In its current format, the Local Plan will not be considered to be sound and will fall at the first hurdle if submitted in its current format to the Secretary of State.

The allocation of site HSG16 within the draft Local Plan:2033 is supported however we strongly object to the exclusion of site WAR008 and propose that it is allocated for housing development moving forward.

It is recognised that WAR008 lies within the Green Belt, however it is considered that this site does not serve the purpose of land within the Green Belt, as set out above. As such, it is considered appropriate that this site is released from the Green Belt.

The site does not make a significant contribution to landscape merit. The appraisal prepared by Scarp and submitted as part of this representation demonstrates that the Council’s assessment of the site’s contribution to landscape merit was over estimated and that the site has greater capacity to accommodate development on landscape grounds.

The initial ecological assessment contained within the Vision Statement concludes that development of the site would not result in unacceptable ecological impacts and would provide the opportunity to deliver both ecological and biodiversity enhancements.

The allocation of WAR 008 for housing development would make a significant contribution to addressing the fundamental flaws contained within the Council’s emerging local plan, as set out above.

The site is developable, deliverable within the next 5 years and is located adjacent to a Tier 1 settlement and is precisely the type of Green Belt location that the NPPF envisages could be released to meet specific development needs. The Vision Statement submitted with this representation demonstrates that the site has capacity to deliver circa. 550 residential units. Both WAR 008 and WAR011 can deliver significant infrastructure in Warlingham, including recreational public open space, highways and off-site green infrastructure. It is therefore clear that WAR 008 is suitable to be allocated for housing development within the emerging local plan.

We trust that these comments are useful at this stage. By way of this letter we reserve the right to comment on further rounds of consultation and attend the Examination in Public on behalf of our client.

We look forward to receiving details of this in due course.
Should you wish to meet to discuss the above in any further detail, or if you require any further information or clarification, please do not hesitate to contact Will Edmonds or Sam Dalzell at this office.

Yours faithfully

[Signature]

WILL EDMONDS
PARTNER
MONTAGU EVANS LLP

Encs.
Appendix 1
Vision Document
VISION DOCUMENT

Land at Green Hill Lane, Warlingham
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TEAM

Developer

Welbeck Land
13 Woodstock Street
London

ADAM Architecture

Westcoast Hampshrie
75 High Street
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Henley House Business Centre
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Litham Design &

Welbeck Land
INTRODUCTION

This Vision Document forms part of a representation to Tandridge District Council on the Regulation 19 consultation on the Local Plan: 2033. This representation is on behalf of a consortium of charities comprising The British Home, Macmillan Cancer Support, The Royal Alfred Seafarers’ Society, Royal Society for Blind Children and the Royal National Lifeboat Institution, thereafter referred to as “The Charities”. The representations are also on behalf of The Charities’ selected development partner Welbeck Strategic Land.

This representation relates to two sites that are surrounded by the existing built-up area of Warlingham and Farleigh Road area and adjacent to Chelsham Common and Great Park. The sites are identified in The Local Plan: Sites Consultation document as WAR008 ‘Land north of Green Hill Lane’ (33.15 ha) and WAR011 ‘Land south of Green Hill Lane’ (1.71 ha). These two sites, together with the adjacent land identified as WAR023 ‘Land at Alexandra Avenue’, represent a significant opportunity to make a significant contribution toward housing delivery for the Council over the emerging Local Plan period. Welbeck Strategic Land has engaged with the landowner of the neighbouring parcels WAR023 to explore the opportunities for a joint masterplan approach to bring forward these sites comprehensively in an effort to optimise development capacity.

Throughout this document, we have included this land to provide the full comprehensive vision. Notwithstanding this, all three sites are capable of being developed independently from each other and in a format that would not prejudice delivery of the other sites.

The Council’s current objectively assessed housing need identifies a requirement for at least 470 new homes per annum over the emerging Local Plan period. These Sites are wholly suitable for development, most notably with their close relationship to the existing settlements and represent a sustainable location for new development growth within the District. These Sites and their general wider context are shown in the figure to the right.
INTRODUCTION

INTRODUCTION TO ADAM ARCHITECTURE

This Vision Document has been progressed by ADAM Architecture which is one of the leading practices in the field of contextual urban design and masterplanning, with over 40 years' practical experience in housing design and traditional architecture.

ADAM Architecture has developed a significant body of residential development work at a wide variety of scales, from small infill sites, to large urban extensions and new settlements spread throughout the United Kingdom. It has pioneered the use of both stylistically prescriptive and 'non-stylistic' design coding and detailed 'pattern book' studies. These help to ensure the maintenance of character, quality and sustainability in masterplanning projects.

ADAM Architecture is the current masterplanner and architect for a new 300 home quarter at Woodstock, Oxfordshire. The land is located on the edge of the Blenheim Palace World Heritage Site and is owned by the Blenheim Estate. Working closely with the landowners and a dedicated multi-disciplinary team, an exceptional urban extension has been developed that will feel like a traditional hamlet on the edge of the historic core of the town. This new community will also help reinforce the viability of the existing facilities in Woodstock, adding employment, and helping to ensure that the town remains vibrant for the future. The architectural design and planning of the new development are in keeping with the local context, with the aim of enhancing the quality of the existing streets and buildings in Woodstock, and creating a cohesive extension that will feel like an extension of the existing town.

ADAM Architecture has established a long working relationship with the Prince's Foundation for Building Communities (PFBC), including high profile projects for the Duchy of Cornwall at Poundbury, Dorchester; Tregunnel Hill and Nansledan, Newquay. At Tenterden, Kent a detailed masterplan of 250 units on 10 hectares provided a cohesive extension to the existing market town. The design was developed according to traditional principles and has a distinct character within the larger community of Tenterden. The new homes are a mixture of sizes and types to reflect the variety found elsewhere in the town, and the use of local materials, including weatherboarding, red brick and hanging tiles, helps to maintain the character of the existing town.

ADAM Architecture's work is characterized by a commitment to sustainability and a focus on traditional materials and methods of construction. The firm is committed to preserving and enhancing the architectural heritage of the communities in which it works, and its projects reflect this commitment through the use of traditional materials and methods of construction. The firm is also committed to ensuring the long-term viability of the communities it works in, and its projects are designed to meet the needs of the residents for the future.

ADAM Architecture is committed to the principles of sustainability and is committed to ensuring that its projects are designed to meet the needs of the communities in which it works. The firm is committed to ensuring that its projects are designed to meet the needs of the residents for the future, and its work is characterized by a commitment to traditional materials and methods of construction. The firm is also committed to preserving and enhancing the architectural heritage of the communities in which it works, and its projects reflect this commitment through the use of traditional materials and methods of construction. The firm is also committed to ensuring the long-term viability of the communities it works in, and its projects are designed to meet the needs of the residents for the future.
1.0 INTRODUCTION
The Site, as shown in more detail on the figure to the right, comprises of approximately 34.85 hectares in total. The Site is split into two parcels WA R008 at approximately 33.15 ha and WA R011 at approximately 1.7 ha.

**WA R008**

The Site abuts the settlement edge to the east and west of the Sunny Bank/Farleigh Road junction and along the northern section of Farleigh Road. The site comprises a large agricultural field, which slopes to the north west and west towards the Farleigh Road housing and southwest towards Greenhill Lane, which lies within a small valley. The steep south-facing slopes of this valley lie within the south-western part of the Site. The site is bounded by hedgerows of various heights and condition, typically supplemented by post and wire fencing.

Housing along Farleigh Road lies to the immediate west of the site. A pasture field and a line of houses lie opposite the site on the northern edge of Harrow Road. Woodland at Mill Common lies to the east and the grassland and scrub of Chelsham Common lies to the north east on the far eastern side of the group of small-scale fields. Housing along Alexandra Road, and a collection of small fields containing pasture and scrub, lie to the immediate south.

The large-scale site field is the product of field amalgamation that has involved the removal of its former network of hedgerows.

**WA R011**

The Site lies between Greenhill Lane and existing housing along Alexandra Road. The western site boundary is defined by rear garden timber fencing. The north western and north eastern site boundaries are defined by tall scrub and trees along the southern edge of Greenhill Lane. The southern site boundary is defined by field boundary hedgerows of varying height and condition.

The Site is made up of a field used for horse grazing and an area of regenerated scrub which has been partially removed. There are elevated middle distance views of the site available from sections of Bridleway 87 to the north and near distance views available from Greenhill Lane.

**WAR011 and adjacent site (WAR023) form part of emerging allocation HSG16 and have been allocated for approximately 50 C2 extra care & C3 residential units.**
LOCATION

The Site is surrounded by the existing built up area of Warlingham and Chelsham Common and Green Belt. Both sides are within the Green Belt and WR008 is within Area of Great Landscape Value.

The Site is surrounded by the existing built up area of Warlingham and Chelsham Common and Green Belt. Both sides are within the Green Belt and WR008 is within Area of Great Landscape Value.
3. HISTORIC BACKGROUND AND DEVELOPMENT OF WARLINGHAM

Existing Buildings

Site Boundary

New Buildings

Vehicular Routes

The Site

Warlingham Green

The Site

School

Chelsham Common

and Bull Inn

Growth occurring near rail station

Growth along Sunny Bank

Croydon Mental Hospital

Growth along Harrow Rd

Further growth occurring near rail station

Growth along Limpsfield Rd.

Significant growth along

southern portion of Limpsfield Rd.

Further growth occurring near rail station

Infill growth within village centre

Growth along Farleigh Rd.

Significant growth north of Limpsfield Rd.

Further growth occurring near rail station

Infill growth along

Great Park redevelopment

Great Park redevelopment and Limpsfield Rd.

Further growth occurring near rail station

Infill growth along

and Limpsfield Rd.

Significant growth along

and Limpsfield Rd.

Further growth occurring near rail station

Infill growth along
In assessing sites that may be allocated for development in plans, it should be ensured that:

- Appropriate opportunities to promote sustainable transport modes can be taken up;
- Safe and suitable access to the site can be achieved;
- Any significant impacts from the development on the transport network (in terms of capacity and congestion) or on highway layout are considered.

Any future planning application would also be accompanied by a

- Public Transport Plan
- Sustainability Transport Model

**SUSTAINABLE TRANSPORT MODES**

- The main bus routes through Warlingham are services 337, 409 and
- Service 42 between Warlingham and West Croydon;
- Service 17 between Selsdon, Warlingham, Upper Warlingham Station, Whyteleafe Tavern / Station, Caterham and Godstone Monday – Saturday at an hourly frequency;
- Service 403 routes between Warlingham and West Croydon at around 12 – 20 minutes frequency through the day.

Any future planning application would also be accompanied by a

- Public Transport Plan
- Sustainability Transport Model

**PUBLIC TRANSPORT**

**4. TRANSPORT AND ACCESSIBILITY**
4.0 TRANSPORT AND ACCESSIBILITY

The Site is located on the north east side of Warlingham. The village has a number of facilities, identifying where improvements are necessary which would benefit both existing and future residents.

Any future planning application will include a pedestrian and cycle audit of the main routes between the Site and local facilities, identifying where improvements are necessary which would benefit both existing and future residents.

Warlingham's facilities will be within a reasonable walk and cycle distance for many residents of the proposed development.

**FACILITIES**

- Access to Town Centre Mixed Use
- Education
- Open Space
- Recreational Route
- Transportation
- Other Routes of Public Access
- Community Facilities
- Footpath
- Bridleway

**COMMUNITY FACILITIES**

- Village Hall
- Care Home
- Healthcare
- Places of Worship
- Theatre
- Retail/Hotel
- Railway Station

**OPEN SPACE**

- Leisure Centres
- Parks/Playgrounds/Recreation & Sports
- Leisure

**EDUCATION**

- Library
- College
- School
- Nursery

**5 min walking distance**

**10 min walking distance**

**15 min walking distance**

**20 min walking distance**

**25 min walking distance**

Facilities Map
The village of Warlingham lies on the North Downs, east of the Caterham Valley, between the urban and suburban area of Croydon to the north and the open fields and woodland of Surrey to the south. Chelsham Common and the associated small village of Chelsham lie on the north eastern edge of the village.

The small historic core of the village was established on an area of gently sloping land between two valleys and is focused on The Green and the buildings immediately surrounding it. The various phases of village expansion have extended the built-up area into these valleys, both to the east and west. Housing along Farleigh Road heads eastwards from The Green, bisecting the upper part of one valley before extending onto an area of relatively flat land alongside the Site.

This topographical variation in the existing settlement adds to the character and variety of the village.

The village includes the belt of housing along Farleigh Road as well as a line of housing that extends south eastwards along Harrow Road from the Farleigh Road/Harrow Road junction. This north eastern extension of Warlingham is an integral part of the settlement pattern.

The Woldingham Golf Course on the southern edge of the village and extensive tracts of countryside outside the built-up area to the north west, north and north east of the built-up area provide a rural setting to the village. Blocks of woodland are a characteristic feature of the rural landscape surrounding the village, and include woodland near Greatpark to the north of Harrow Road and along the south eastern edge of Warlingham.

6.0 Landscape Character and Existing View
12

LANDSCAPE CHARACTER

Warlingham has been identified as part of emerging allocation (HSG16) in the Draft 2033 Local Plan. This allocation is for approximately 50 units (C2 Extra Care and C3).

WA R011 and the site on its south-easter n edge (WA R023) form part of emerging allocation (HSG16) in the Draft 2033 Local Plan. This allocation is for approximately 50 units (C2 Extra Care and C3).

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5.0 LANDSCAPE CHARACTER AND EXISTING VIEW
EXISTING VIEWS

A mixture of open and partial publicly accessible views of the site

5.0 LANSCAPE CHARACTER AND EXISTING VIEW
5.0 LANDSCAPE CHARACTER AND EXISTING VIEW

Landscape and Visual Survey provided by SCARP
5.0 Landscape Character and Existing View

Landscape and Visual Survey provided by SCARP
LAND AT GREEN HILL LANE, WARLINGHAM

Vision Document

Landscape and Visual Survey provided by SCARP

5.0 LANDSCAPE CHARACTER AND EXISTING VIEW
The site (WAR 008 and WAR 011) is considered to be of limited ecological value. It mainly comprises improved grassland fields with boundary hedgerows and areas of scrub, ruderal and a poor condition wooded area in the southwest of WAR 011. A small number of mature trees along the boundary of the site are considered to have potential to support roosting bats, although the majority of these are to be retained. The hedgerows are considered to be of greatest value within the site, but are to be largely retained with only minor losses for access.

The majority of the site is subject to regular management that keeps the grassland with a short sward and maintains the boundary hedgerows. This intense management reduces the overall value of the site and the proposed areas of open space allow for many opportunities for enhanced management to create ecological enhancements. The closest statutory designated site is Blanchman’s Farm Local Nature Reserve, which is located approximately 550m southwest of the site. This Local Nature Reserve is separated by residential development and, given the amount of open space proposed within the site, it is not considered that there will be any adverse direct or indirect effects on this statutory designated site as a result of the proposals.

No evidence of protected species was recorded within the site and it is considered that the site provides only limited opportunities for protected species. Additional surveys for bats are to be undertaken, although the majority of the features suitable for foraging and commuting bats are to be retained and buffered from the proposed development and therefore impacts are considered to be low and easily mitigated through additional planting if necessary.

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7. HERITAGE ASSETS AND SETTING

1. Warlingham Park Hospital (Grade II)
2. Post at Edge of Little Bank Wood (Grade II)
3. Post at NGR 371591 (Grade II)
4. Post North of the Narrow Public House (Grade II)
5. Church of All Saints (Grade II*)
6. War Memorial to the First World War (Grade II)
7. The Vicarage (Grade II*)
8. Barn 20 Yards South West (Grade II)
9. The White Lion Pub (Grade II)
10. 23-31 Leas Road (Grade II)
11. Coal Tax Post at NGR TQ 365583 (Grade II)
12. Chelsham Place Farm House (Grade II)
13. Coal Tax Post at NGR TQ 365584 (Grade II)

THE SITE

Warlingham Country Hospital Tower viewed from Site
The simple vernacular architecture of the county enjoyed a revival in the nineteenth century. Architects such as Edwin Lutyens, Harold Falkner, Ernest Newton, Leonard Stokes began studying Surrey architecture and started to emulate its traditional patterns of building, consciously creating new buildings in the vernacular tradition and striving to emulate its traditional patterns of building, consciously creating new buildings in the vernacular tradition.

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This part of Surrey is well known for its traditional vernacular cottages, scattered throughout the area are very simple classical buildings, which stand out due to their different aesthetic.

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8. LOCAL BUILT CHARACTER

BUILDING MATERIALS

The characteristic palette of materials mostly originates from the locality and contributes greatly to the character of the area. Although Surrey is not well known for its use of stone, there are local types that can be seen in the area. Red brick is a very common material, due to the natural predominance of clay across the county as a whole.

Render, stucco and painted brick are also quite common and, where used, they tend to stand out in the streetscape against the predominant red brick and tile. Painted or whitewashed render is often seen in combination with timber framing, creating an interesting contrast in tones.

Clay tiles hung vertically on the fronts and sides of buildings are very common in this part of Surrey, usually seen on gable ends and the upper floors of houses above brick.

ROOFS

Roofs tend to be relatively steeply pitched with varied eaves heights. There are many cases of gables ends and cross wings projecting out from the fronts of buildings, and often lower scale additions both on older cottages and new houses. Because of the dominance of clay in the locality, most roofs are covered with traditional red clay tiles, with slate used on only a few examples. Thatched examples are rare and nearly all have been replaced by tile.

WINDOWS

Window types vary throughout the area, depending on the age and scale of the property. However, many older cottages retain their attractive casement windows, with some good early examples remaining in timber with lead cames. In addition, there are some attractive features windows, such as bay and oriel types, which serve to emphasize the gable ends of buildings and create focal points on building facades. Sash windows remain common on many eighteenth and early nineteenth century houses.

DOORS AND PORCHES

The humblest buildings have plain panel doors simply punched into the wall, often with some kind of canopy or porch to offer protection against inclement weather. These can often be relatively informal and asymmetric in design. Also seen on some of the more standard nineteenth century houses is the central, projecting porch with a pitched, gabled roof. Where classical surrounds are found, these also tend to be very simple.

BOUNDARY TREATMENTS AND SETBACKS

Boundary treatments are strong in the area, but are not necessarily formal in nature. Walling is common, usually in local rubblestone, but they tend to be relatively low in height, allowing views into properties. Most houses are set back behind short front gardens. In more urban parts of villages, traditional buildings can sit hard upon the road edge.

LAND AT GREEN HILL LANE, WARLINGHAM
8. LOCAL BUILT CHARACTER

To understand the character of the Site, our analysis has assessed the forms and qualities of other regional towns and villages. Three village and townscape areas are illustrated which highlight the definable character of these.

Each place is defined by its natural characteristics which inform the unique street pattern and result in the distinctive creation of triangular parcels of land. Each area has three main central features that provide character:

1. Central triangular shaped village green;
2. A recreation common large enough to accommodate leisure activity; and
3. A market place within proximity of the village green. This may take the form of a green or hardscape.

These studies are a source of inspiration and insight into what makes an area attractive and distinctive and may assist with future development.
9. CONSTRAINTS & OPPORTUNITIES
10.0 Key Principles of Masterplan

- Chelsham Road
- Farleigh Road
- Sports Pitches
- Neighbourhood Centre
- Neighbourhood Quarter
- Neighbourhood Quarter
- Neighbourhood Quarter
- Green Corridor
- Green Connection
- Enhanced Green Buffer
- Views to tower
II. SITE ACCESS

The primary vehicular access to the site is proposed from the north. This route will provide access to the western part of the site and connect to the A22 and Junction 6 of the M25. The secondary access from Chelsham Road to the east will provide access to the eastern part of the site.

We are satisfied that safe and suitable access to the site can be achieved in all of the above locations, meeting local and national highway design guidance.

Any future planning application would be accompanied by detailed access drawings and independent Stage 1 Road Safety Audits of the proposed access arrangements.

TRAFFIC IMPACTS

Warlingham’s roads are used by through traffic which is most likely accessing the A22 and Junction 6 of the M25. One of the benefits of the above access strategy is that there is immediate dispersal of development-generated traffic on the wider local highway network.

Notwithstanding this, we accept the proposed development will add traffic onto the local highway network in Warlingham and beyond. We are keen to work at the local level and with the local highway authority to establish pinch points and whether the proposed development can fund and deliver highway improvements.

We are satisfied that safe and suitable access to the site can be achieved in all of the above locations, meeting local and national highway design guidance.

Any future planning application would be accompanied by detailed access drawings and independent Stage 1 Road Safety Audits of the proposed access arrangements.
12. CONCEPT MASTERPLAN

The illustrative masterplan demonstrates how the Site is both a suitable and sustainable location to provide new homes. These homes will make a meaningful contribution towards meeting the housing needs of the area. A suitable mix of dwelling type and size, to deliver a balanced and mixed community, can be provided. The key elements of the illustrative masterplan are as follows:

**Character and Identity**
- A layout that responds to, and reinforces, the local distinctive patterns of development, landscape and culture, whilst generating a unique sense of place;
- A street pattern and layout informed by the land form;
- A layout that addresses the scale and mass of the built form, makes best use of the land and respects surrounding residential character; and
- The retention and replenishment of existing trees and hedgerows of quality as part of the Site-wide landscape and open space strategy.

**Continuity and Enclosure**
- Create streets that promote continuity of frontages and enclosure of space, with development that clearly defines public and private areas;
- A proposal that ensures that all public space is overlooked by buildings to provide a safe and secure environment;

**Ease of Movement**
- A masterplan that promotes accessibility and local permeability, putting people before traffic;
- Provisions that allow for a reduced dominance of the car through the provision of a mixed parking strategy;
- Streets that provide for calming measures and reduce vehicle speeds.

**Legibility**
- Provide recognisable routes, intersections and landmarks to help people find their way around; and
- Achieve a hierarchy of spaces, each with their own distinctive character.

**Adaptability**
- The potential to provide a range of housing types and tenures to meet local housing needs and support a diverse, inclusive and sustainable community;
- Provide housing that is robust and adaptable to changing requirements.

**Diversity**
- The potential to provide a range of housing types and tenures to meet local housing needs and support a diverse, inclusive and sustainable community;
- Provide accessible homes, facilities and spaces to help people.

**Sustainability**
- Encourage sustainable living through the layout of the scheme in terms of transport, energy use, water use and use of materials; and
- Enhance the overall value of the development through positive social, economic and environmental benefits.
Vision Document

Key Views Plan

Direct view to Warlingham Park Hospital Tower

Views to Warlingham Park Hospital Tower

Limit of development defined by views

View into site from top of hill to the woodlands. Defined by existing tree clusters

12.0 Concept Masterplan

North

Land at Green Hill Lane, Warlingham
1. Market square
2. The green
3. Neighbourhood greens
4. Pocket parks
5. Pocket parks
6. Greenhill Common
7. Allotment gardens and orchards
8. SuDS locations
9. Orchard Common
10. Sports pitch
11. Bridleway
12. CONCEPT MASTERPLAN

INDICATIVE OPEN SPACE PLAN
LAND AT GREEN HILL LANE, WARLINGHAM

INDICATIVE LAND USE PLAN

1.0 CONCEPT MASTERPLAN
### Indicative Density Plan

#### Site boundary
- Low residential density (10-15 dph)
- Medium residential density (15-25 dph)
- High residential density (25-40 dph)

#### Potential Location for Later Living Facilities
- Potential mixed use

#### Note:
Figures are shown as net density.

### Approximate Areas

#### WAR 008
- Total Area: 33.15 ha
- Developable Area: 18.6 ha
- Open Space: 11.4 ha
- Unit Count: approx. 550 units
- Gross Density: approx. 16.5 dph
- Net Density: approx. 29.5 dph

#### WAR 011
- Total Area: 1.7 ha
- Developable Area: 1.16 ha
- Unit Count: approx. 50 units
- Gross Density: approx. 29 dph
- Net Density: approx. 43 dph

#### WAR 023
- Total Area: 1.4 ha
- Developable Area: 1.0 ha
- Unit Count: approx. 42 units
- Gross Density: approx. 30 dph
- Net Density: approx. 43 dph

---

#### Concept Masterplan

- **Low residential density (10-15 dph)**
- **Medium residential density (15-25 dph)**
- **High residential density (25-40 dph)**

- Potential mixed use

- Potential Location for Later Living Facilities

- **Note:** Figures are shown as net density.

- **Approximate Areas**
  - **WAR 008**
    - Total Area: 33.15 ha
    - Developable Area: 18.6 ha
    - Open Space: 11.4 ha
    - Unit Count: approx. 550 units
    - Gross Density: approx. 16.5 dph
    - Net Density: approx. 29.5 dph
  - **WAR 011**
    - Total Area: 1.7 ha
    - Developable Area: 1.16 ha
    - Unit Count: approx. 50 units
    - Gross Density: approx. 29 dph
    - Net Density: approx. 43 dph
  - **WAR 023**
    - Total Area: 1.4 ha
    - Developable Area: 1.0 ha
    - Unit Count: approx. 42 units
    - Gross Density: approx. 30 dph
    - Net Density: approx. 43 dph
Vision Document

Indicative Heights Plan

12.0 Concept Masterplan

Land at Green Hill Lane, Warlingham
The illustrative masterplan detail depicts sites WAR011 (Land South of Green Hill Lane) and WAR023 (Land at Alexandra Avenue). Together these form part of the emerging allocation HSG16. The design provides a seamless approach not only with the existing neighbourhood but also between the two allocated sites. Notwithstanding this, the sites are capable of being taken forward independently from each other.
Vision Document

1. Village green
2. Market place
3. Recreation common
4. Church yard
5. Neighbourhood Green

SCALE COMPARISON

1:20 CONCEPT MASTERPLAN
A well-treed character. Hence, the importance of the trees provides a strong visual focus and an opportunity to landscape the site in a manner that enhances the overall aesthetic of the area. The greenery on the boundary of the site would contribute to a new housing area with natural topography within the site has guided the adoption of layered of vegetation. Any new buildings would be set back from the site boundary, allowing for an unobstructed view of the existing landscape. The gently sloping site landform would contribute to a housing area that reflects the identity of Chelsham.
LAND AT GREEN HILL LANE, WARLINGHAM

Vision Document

Connected

Green Corridor

Chelsham Road

Farleigh Road

Green Corridor

Green Connection

Enhanced Green Buffer
Appendix 2

Landscape and Visual Appraisal
Land north of Greenhill Lane (WAR008) and Land south of Greenhill Lane (WAR011)

Landscape and Visual Appraisal

on behalf of

Macmillan Cancer Support
The Royal Alfred Seafarers’ Society
The British Home Royal National Lifeboat Institution
The Royal London Society for Blind People ("The Charities")

DRAFT
Land north of Greenhill Lane (WAR008) and Land south of Greenhill Lane (WAR011)

Landscape and Visual Appraisal

on behalf of

Macmillan Cancer Support
The Royal Alfred Seafarers’ Society
The British Home
Royal National Lifeboat Institution
The Royal London Society for Blind People ("The Charities")

Approved
Stephen Kirkpatrick

Position
Director

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1.0 INTRODUCTION

1.1 Background to the Study

1.1.1 The Charities aim to promote two sites in Warlingham for release from the Green Belt and for residential-led redevelopment through engagement in the Tandridge District Council (TDC) Local Plan process. The two sites are:

- **Land north of Greenhill Lane, Warlingham:** TDC identify this site as WAR 008, which is a large field adjacent to the built-up area of Warlingham. TDC has estimated that this site could accommodate 600 units of housing and has a developable area of 33.15 ha;

- **Land south of Greenhill Lane, Warlingham:** TDC identify this site as WAR 011, which comprises woodland (some of which has been partially cleared) and a grazing field on the edge of the built-up area of the village. TDC has estimated that this site could accommodate 50 units of housing and has a developable area of 1.71 ha. However, a Site-Based Ecology Assessment currently restricts this yield to 27 units.

1.1.2 TDC have prepared a Local Plan Sites Consultation document, which was published for consultation on 4th November 2016. The consultation period runs to 30th December 2016. The proposed Sites Consultation document sets out:

A. the sites which have been discounted and are not considered appropriate for development, including the reasons for this;

B. the sites which are still subject to further assessment and the reasons for this; and

C. the sites which could come forward now and are likely, on the evidence available, to be included in the final Local Plan once it is completed.

1.1.3 In the case of WAR 008, the Site Consultation document proposes that this site should no longer be considered for allocation in the Local Plan going forward as it has “a low capacity to accommodate development on landscape grounds.”
1.1.4 In the case of WAR 011, the Site Consultation document proposes that this site should continue to be considered but that further evidence is needed before a conclusion can be reached.

1.1.5 The TDC conclusions on the potential for these two sites to accommodate new housing development have been informed by the findings of the Tandridge Landscape Capacity and Sensitivity Study (LCSS). This capacity and sensitivity study was commissioned to establish the capacity of the landscape to accommodate new housing development on a site by site basis.

1.1.6 Scarp, a specialist landscape and environmental consultancy, was instructed by The Charities in November 2016 to (a) undertake a landscape and visual appraisal of the two sites and their surroundings, and (2) provide a critical review of the findings of the LCSS in relation to these two sites.

1.2 Tandridge Landscape Capacity and Sensitivity Study Methodology

1.2.1 Existing landscape features, landscape character, and views were assessed in this study on an individual site basis. Overall landscape sensitivity was then assessed for each site taking into account the following elements in tabulated form:

| Inherent landscape quality (intactness and condition) | Ecological sensitivity | Inconsistency with existing settlement form/pattern | Contribution to separation between settlements | Contribution to the setting of surrounding landscape/settlement | Views (visual sensitivity) | Potential for mitigation (inverse score i.e. high potential for mitigation = low sensitivity, therefore low score) | Overall sensitivity judgement |
|-------------------------------------------------------|------------------------|---------------------------------------------------|-----------------------------------------------|---------------------------------------------------------------|---------------------------|----------------------------------------------------------------------------------|-----------------------------

1.2.2 Overall landscape value for each site was then assessed taking into account the following elements in tabulated form:

---

1 Tandridge Landscape Capacity and Sensitivity Study (HDA, October 2016)
For each site, the elements within the landscape sensitivity and landscape value tables were graded on their degree of sensitivity or value, ranging from negligible to major. This continuum of sensitivity and value was divided into a 5 point scale as follows: 1: Negligible, 2: Slight, 3 Moderate, 4: Substantial and 5: Major.

The scores for each element within the landscape sensitivity and landscape value tables were then added up to give overall sensitivity and value scores for each site, with the overall scores graded as follows for both sensitivity and value: 1-7: Negligible 8-14: Slight 15-21: Moderate 22-28: Substantial and 29-35: Major.

Finally, the landscape capacity of each site was determined by combining the sensitivity and value ratings derived from the tabulated assessments set out above, using the following matrix:

<table>
<thead>
<tr>
<th>Sensitivity</th>
<th>Major</th>
<th>Substantial</th>
<th>Moderate</th>
<th>Slight</th>
<th>Negligible</th>
</tr>
</thead>
<tbody>
<tr>
<td>Major</td>
<td>Negligible</td>
<td>Negligible</td>
<td>Negligible / low</td>
<td>Low</td>
<td>Low / medium</td>
</tr>
<tr>
<td>Substantial</td>
<td>Negligible / low</td>
<td>Low</td>
<td>Low / Medium</td>
<td>Medium</td>
<td></td>
</tr>
<tr>
<td>Moderate</td>
<td>Negligible / Low</td>
<td>Low</td>
<td>Medium</td>
<td>Medium / high</td>
<td>High / medium</td>
</tr>
<tr>
<td>Slight</td>
<td>Low</td>
<td>Low / medium</td>
<td>Medium / high</td>
<td>High</td>
<td>High / Very high</td>
</tr>
<tr>
<td>Negligible</td>
<td>Low / medium</td>
<td>Medium</td>
<td>High / medium</td>
<td>Very high</td>
<td>Very high</td>
</tr>
</tbody>
</table>
2.0 WAR 008 AND WAR011 LANDSCAPE CONTEXT

2.1 Warlingham Settlement Form and Pattern

2.1.1 The village of Warlingham lies on the North Downs, east of the Caterham Valley, between the urban and suburban area of Croydon to the north and the open fields and woodland of Surrey to the south.

2.1.2 The historic core of the village is focussed on The Green and the buildings immediately surrounding it (Figure 1: Site Context). The original small settlement has expanded greatly during the 20th century. New built development extended along Limpsfield Road both to southeast towards Titsey and Oxted, and to the northwest towards Hamsey Green (Figure 2: Wider Landscape Aerial Photograph). It also extended onto the scarp slope of the North Downs to the southwest along Westhall Road and to the west along Hillbury Road, taking advantage of the ease of access to the London to Caterham railway and the A22, which form a transport corridor along the floor of the Caterham Valley on the western side of the village.

2.1.3 Built development on the side slopes of the Caterham Valley comprises a mixture of detached and semi-detached houses with typically deep, well-treed rear gardens, all set against a backdrop of woodland on the mid-slopes of the valley.

2.1.4 Built development along Limpsfield Road comprises a mixture of predominantly semi-detached houses, some detached houses as well as clusters of business and retail properties. There is a concentration of retail and community buildings centred on The Green, with a second cluster of retail/business buildings at the Limpsfield Road / Chelsham Road junction.

2.1.5 Built development has also extended along Farleigh Road to the east of The Green with additional lines of buildings along the section of Farleigh Road heading northeast on the western side of WAR 008.

2.1.6 The density of development in the western part of the village is generally low on account of the large gardens of the residential properties. Buildings density in the eastern part of the...
village, east of Limpfield Road, is generally slightly higher. The Warlingham Village Design Statement (VDS), prepared in 2012, identifies the balance of buildings and open space as major part of settlement character and describes its character as “dense rural”.

2.1.7 The Woldingham Golf Course on the southern edge of the village and extensive tracts of countryside outside the built up area to the northwest, north and northeast of the built-up area provide a rural setting to the village and have been identified in the VDS as open land that forms part of “the familiar and cherished local scene”. The extract from the VDS below identifies the location of this countryside, which includes WAR 008 and WAR 011 as Open Land.

Special Areas and Places (Extract from Page 4, Warlingham Village Design Statement)

2.1.8 The small historic core of the village was established on an area of gently sloping land between two valleys. The various phases of village expansion have extended the built-up area into these valleys, both to the east and west. Farleigh Road heads eastwards from the historic core at The Green, initially passing through the upper part of the Crewe’s Lane valley before
descending into, and ascending out of, the floor of this valley at the Farleigh Road / Sunny Bank junction (Figure 3: Landform and Topography). The lower parts of this valley are illustrated by Photographs C and I, with photographic viewpoint locations identified on Figure 4. Housing along Farleigh Road occupies both the side slopes of the valley and the flat to gently sloping land on the eastern side of the valley. The western and south-western extensions of the village along Hillbury Road and Westhall Road also extend onto the side slopes of the Caterham Valley where they benefit from a woodland backdrop. This topographical variation in the existing settlement adds to the character and variety of the village.

2.1.9 Blocks of woodland are a characteristic feature of the rural landscape surrounding the village (Figure 2: Wider Landscape Aerial Photograph) and include woodland near Greatpark to the north of Harrow Road (Figure 1: Site Context) and along the south-eastern edge of WAR 008 at Mill Common (see Figure 4: Photographic Viewpoint Location Plan).

2.1.10 A network of public rights of way cross-crosses this rural landscape (Figure 1: Site Context).

2.2 Chelsham Settlement Form and Pattern

2.2.1 Chelsham lies in the rural parish of Chelsham and Farleigh. The parish lies at a high level on the North Downs and parts adjacent to Warlingham parish are well wooded. Chelsham comprises a scattered collection of houses and cottages. Chelsham Common lies alongside the former Bull Inn (now the Coach House public house) on the eastern side of Chelsham Road. Greatpark lies approximately 350m northeast of Harrow Road and is a large housing area developed in the grounds of the former Warlingham Park Hospital.
3.0 WAR 008 LANDSCAPE AND VISUAL APPRAISAL

3.1.1 The WAR 008 site abuts the settlement edge to the east and west of the Sunny Bank/Farleigh Road junction and along the northern section of Farleigh Road.

3.1.2 The site comprises a large agricultural field, which slopes to the northwest and west towards the Farleigh Road housing and southwest towards Greenhill Lane, which lies within a small valley. The steep south-facing slopes of this valley lie within the south-western part of the site (Photograph B).

3.1.3 The site is bounded by hedgerows of various heights and condition, typically supplemented by post and wire fencing, including:-

- a gappy hedgerow with occasional trees along Green Lane (Bridleway 87) to the west (Photograph D);
- a trimmed hedgerow along Harrow Road to the north (Photograph F);
- trimmed hedgerows along the eastern site boundary with Chelsham Road (Photograph E) and along a group of small-scale fields between the site and Chelsham Road (Photographs L and M);
- a low gappy hedgerow along Greenhill Lane (Bridleway 177) to the south (Photographs A, B and H).

3.1.4 Housing along Farleigh Road lies to the immediate west of the site. A pasture field and a line of houses lie opposite the site on the northern edge of Harrow Road. Woodland at Mill Common lies to the east and the grassland and scrub of Chelsham Common lies to the northeast on the far eastern side of the group of small-scale fields (see Figure 4: Photographic Viewpoint Location Plan). Housing along Alexandra Road and a collection of small fields containing pasture and scrub lie to the immediate south.

3.1.5 The large-scale site field is the product of field amalgamation that has involved the removal of its former network of hedgerows, which are illustrated on the extract below from the 1894-1895 Ordnance Survey map.
WAR 008 lies within Landscape Character Area CD6: Forestdale to Woldingham Chalk Down with Woodland, as identified in the Surrey Landscape Character Assessment: Tandridge District (April 2015). Key characteristics, as identified in this character assessment, include:-

- The character area contains a mosaic of arable fields, pasture and woodland (predominately ancient woodland).
- Woodland blocks and tree cover restricts long distance views.
- Roads cross the majority of the character area, and there is a network of public rights of way.
- The character area includes settlement to the east of Warlingham, including Fairleigh, Great Park private housing estate in the centre of the character area, along with scattered farmsteads and roadside dwellings.

Partial views of the site are available from Greenhill Lane and Sunny Bank and these are dominated by steep slopes within the south-western part of the site (Photographs A and B).
More open views of the site are available at higher level from Bridleway 87, which passes alongside the north-western site boundary (Photographs C and D).

3.1.8 **Photograph C** illustrates a view looking southeast across the far southern part of the site towards housing at Alexandra Road, which lies in the small valley on the edge of the settlement. A belt of mature trees extends to the left of the Alexandra Road housing in this view. This vegetation belt includes trees and scrub in WAR 011, which is located between this housing and an agricultural shed in the field to the south of WAR 011, and woodland at Mill Common further to the right in this view. It is a well-treed skyline.

3.1.9 **Photograph D** illustrates a view looking northeast across the site from Bridleway 87. The western edge of this bridleway is defined by rear garden boundary hedges, fences and garages. The eastern edge is defined by a gappy hedgerow with occasional mature oak trees. Housing on the northern edge of Harrow Road, opposite the northern site boundary is clearly visible in this view. The water tower at the former Warlingham Park Hospital highlights the presence of the Greatpark housing area.

3.1.10 Eastward views along Harrow Road include the above housing on the northern edge of Harrow Road (**Photograph F**). Westward views along Harrow Road include housing near the Harrow Road / Farleigh Road junction (**Photograph G**). There is visual coalescence between the two groups of houses.

3.1.11 There are a variety of glimpsed views (**Photograph H**) and open, partial views (**Photograph B**) of the site available from Greenhill Lane along the south-western site boundary. Glimpsed views of housing along Farleigh Road are also available in these views (**Photograph H**). **Photograph I** provides a view looking north from the western end of Greenhill Lane and illustrates the settlement edge along Sunny Bank, the well-vegetated character of the valley on the northern side of Farleigh Road and the rising land to the north of this valley, both within the site and along Farleigh Road.

3.1.12 Most views from the southern section of Chelsham Road are enclosed by housing, agricultural buildings and roadside hedges on the western side of the road. **Photograph N** provides a glimpsed view towards WAR008, obtained through a gap in the roadside hedges. The large
block of woodland at Mill Common (Figure 2: Wider Landscape Aerial Photograph) provides robust screening and limits visibility to views from sections of Chesham Road. Photograph E provides a view looking northwest from Chesham Road and illustrates how a trimmed roadside hedgerow tends to enclose winter views into the site. Houses on the western side of Farleigh Road are a readily noticeable component of these views. There is visual coalescence between these houses and those located near the common on the western side of Chelsham Road.

3.1.13 Moving further to the north, views from Chesham Road tend to become enclosed by either the well-treed cluster of residential properties along the western edge of the road (Photograph K) or by a tall trimmed hedgerow that encloses a group of small-scale fields between the WAR008 site and Chelsham Road (Photograph J). Views from Chelsham Common vary according to location, with views from northern parts enclosed by a tall trimmed hedgerow along the western edge of Chelsham Road (Photograph L). These views have an open, rural character, which is imparted by a well-treed skyline and areas of grassland both on the common and in the small-scale fields to the west.

3.1.14 Views from southern parts of Chelsham Common tend to be more enclosed by intervening vegetation and include glimpsed views of the housing along the northern edge of Harrow Road (Photograph M).

3.1.15 The small-scale fields on the western side of the road provide the immediate landscape and visual setting for Chelsham Common (Photographs L and M). A line of existing housing on Harrow Road opposite the northern site boundary may be seen in the middle distance (Photograph M). The rural character of the common has been substantially conserved with the development of this housing due to the effects of distance and the screening provided by intervening layers of vegetation.

4.0 WAR 011 LANDSCAPE AND VISUAL APPRAISAL

4.1.1 The WAR 011 site lies between Greenhill Lane and existing housing along Alexandra Road. The western site boundary is defined by rear garden timber fencing. The north-western and
north-eastern site boundaries are defined by tall scrub and trees along the southern edge of Greenhill Lane. The southern site boundary is defined by field boundary hedgerows of varying height and condition.

4.1.2 The site is made up of a field used for horse grazing (Photograph P) and an area of regenerated scrub which has been partially removed (Photograph O). There are elevated middle distance views of the site available from sections of Bridleway 87 to the north (Photograph C) and near distance views available from Greenhill Lane (Photograph H).

5.0 WAR 008 LANDSCAPE CAPACITY AND SENSITIVITY REVIEW

5.1.1 A commentary is provided below on the WAR 008 assessment findings and the scores attributed to each of the assessment criteria used in the LCSS for determining landscape sensitivity and landscape value. Reasoned justifications are provided where the Scarp assessment scores differ from those identified in the LCSS.
### TABLE 4.1: REVIEW OF LANDSCAPE SENSITIVITY AND VALUE FINDINGS FOR WAR 008

<table>
<thead>
<tr>
<th>LCSS LANDSCAPE SENSITIVITY FINDINGS FOR WAR 008</th>
<th>LCSS SCORE</th>
<th>SCARP APPRAISAL</th>
<th>SCARP SCORE</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Inherent landscape quality (intactness and condition)</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>The site is a gently sloping large field with removed boundaries, in pasture at the moment. There are no trees within the field. There is a remnant field boundary at the northern end of the field. To the south east there is a post and wire fence and low hedge with gaps. Along Green Lane public right of way there is an established, but broken, native hedge and some mature trees. To the north there is a hedge boundary with Kennel Farm and an established hedge boundary including mature oaks with the field next to Chelsham Common. The Boundary along Harrow Road is an established hedge, with hedgerow trees but with gaps in places. Urban Agricultural Land Classification.</td>
<td>3</td>
<td>Landscape condition is the degree to which the individual characteristics of a landscape are in a good state of repair or health from an ecological, functional and visual perspective. This large-scale field is the product of field amalgamation that has involved the removal of its former network of hedgerows. It is identified as a ‘prairie’ field in the Surrey Historic Landscape Classification Study and this ‘prairie’ field is a visually discordant landscape component in terms of the small-scale fields that surround the site. It has a less than moderate landscape quality sensitivity due to the loss of field boundary hedgerows across the site, the resultant creation of a visually bland site landscape and the negligible ecological sensitivity identified in the LCSS (see below).</td>
<td>2</td>
</tr>
<tr>
<td><strong>Ecological sensitivity</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>There are some small hedgerow trees such as hawthorn. There are bluebells along hedgerows and good quality mature oaks.</td>
<td>1</td>
<td>Agreed.</td>
<td>1</td>
</tr>
<tr>
<td><strong>Inconsistency with existing settlement form/pattern</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Warlingham developed on flat slopes between valleys. Development here would cross a small valley which currently forms part of the edge of settlement and therefore would be inconsistent with the</td>
<td>5</td>
<td>It would be correct to state that the small historic core of the village was established on ‘flat’ slopes between valleys. However, the LCSS is incorrect to suggest that the existing settlement does not occupy</td>
<td>3</td>
</tr>
</tbody>
</table>
settlement pattern. The site is attached to the settlement boundary along a small part of the perimeter, and is attached to a separate settlement to the west (along Farleigh Road).

both ‘flat’ slopes and valleys. Farleigh Road heads eastwards from the historic core at The Green, initially passing through the upper part of the Crewe’s Lane valley before descending into and ascending out of a deep section of this valley at the Farleigh Road / Sunny Bank junction (Photograph C, Photograph I, and Figure 3: Landform and Topography). Housing along Farleigh Road occupies both the side slopes of the valley and the flat to gently sloping land on the eastern side of the valley. The western and south-western extensions of the village along Hillbury Road and Westhall Road also extend onto the side slopes of the Caterham Valley where they benefit from a woodland backdrop. Any new housing on WAR 008 would be entirely inconsistent with the settlement pattern. In terms of elevation, a large area of housing between Limpsfield Road and the Woldingham Golf Club lies at a higher elevation than any housing that would be developed on the WAN 008 site and is well integrated into the wider rural landscape. The LCSS erroneously states that the housing along Farleigh Road forms part of a separate settlement. It is not. The village includes this belt of housing as well as a line of housing that extends south-eastwards along Harrow Road from the Farleigh Road/ Harrow Road junction. This north-eastern extension of Warlingham, as identified in the VDS, is an integral part of the settlement pattern. This is of fundamental importance and the lack of recognition in the LCSS has resulted in a misjudgement of the landscape sensitivity level for the WAR 008 site. Housing development on the WAR 008 site would abut the settlement boundary on two sides and would reflect existing linear development along one of the arterial roads out of the village. Topographical variation in the existing settlement adds to the character and variety of the village. The inclusion of steep slopes and gently sloping land
### Contribution to separation between settlements

| Development here would fill in a gap between Chelsham Hamlet and Warlingham and would lead to coalescence between these settlements. It would impact on the character of Chelsham Common. | A physical and visual gap would be conserved between Chelsham and Warlingham in recognition of the need to conserve the separate identity of Chelsham. Any master-planning of the WAR 008 site would set back new housing from the cluster of small-scale fields that lies opposite Chelsham Common on the western side of Chelsham Road. These small-scale fields provide the immediate landscape and visual setting for Chelsham Common (Photographs L and M). The character of Chelsham Common would be substantially conserved with the location of new housing at the rear of both these small-scale fields and provision of an additional landscape buffer on the western side of these fields. A line of existing housing on Harrow Road opposite the northern site boundary may be seen from Chelsham Common in the middle distance (Photograph M). The rural character of the common has been substantially conserved with the development of this housing due to the effects of distance and the screening provided by intervening layers of vegetation. Any new housing on the WAR 008 site would be located further way from this existing housing and would the common would benefit from additional layers of intervening vegetation. | 3 |

### Contribution to the setting of surrounding landscape/settlement

| The site provides an open rural setting to the developments of Warlingham and Chelsham. The site is visible from the eastern edge of Warlingham. | It is not uncommon for settlements to expand out from their outer edges with resulting visibility from these existing edges. This is a typical part of settlement evolution and landscape planning for settlement expansion needs to consider a wide range of locational | 3 |
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and design issues. Expansion from outer edges will often be preferable if the alternatives involve the loss of small areas of open space closer to settlement centres where these open spaces provide a valuable contribution to settlement character. As identified above, the open rural setting to Chelsham can be substantially conserved with new housing and open space development on the WAR 008 site. Although the WAR 008 site would no longer contribute to the rural setting of Warlingham, this setting would remain in the form of woodland and open common land surrounding the site. Those landscape sensitivities that are most desirable to conserve in terms of their contribution to the open rural setting of the north-eastern part of the village (e.g. a well-treed skyline) would be addressed as an integral part of development master-planning.

### Views (visual sensitivity)

<table>
<thead>
<tr>
<th>Views (visual sensitivity)</th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>There are localised views from Chelsham Road, housing along Harrow Road, housing along Green Lane and housing along Alexandra Avenue. There are views from the football field and public rights of way along Green Lane and Greenhill Lane.</td>
<td>3</td>
<td>The LCSS is correct to state that housing on the WAR 008 site would be very much localised views from adjacent housing and public rights of way. Views from these locations currently include existing housing (Photographs C to E, H to I, M and N). The character and amenity of existing views would be conserved through sensitive master-planning and design.</td>
</tr>
</tbody>
</table>

### Potential for mitigation (inverse score i.e. high potential for mitigation = low sensitivity, therefore low score)

<table>
<thead>
<tr>
<th>Potential for mitigation (inverse score i.e. high potential for mitigation = low sensitivity, therefore low score)</th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>The rural setting of the public rights of way and the recreation ground along Green Lane would be difficult to mitigate. The loss of a green gap between Chelsham and Warlingham would be impossible to mitigate. Mitigation would need to include the introduction of planting across the site in order to reduce impacts on housing in</td>
<td>4</td>
<td>Creative master-planning that recognises both landscape sensitivities and green infrastructure opportunities would deliver a higher level of mitigation than that envisaged in the LCSS. The public rights of way along the site periphery are already subject to the influences of existing rural housing but retain their rural character (Photograph D).</td>
</tr>
</tbody>
</table>

4 Creative master-planning that recognises both landscape sensitivities and green infrastructure opportunities would deliver a higher level of mitigation than that envisaged in the LCSS. The public rights of way along the site periphery are already subject to the influences of existing rural housing but retain their rural character (Photograph D).
<table>
<thead>
<tr>
<th>Warlingham and Chelsham compromising the open character of the area</th>
<th>Any housing developed on the WAR 008 site would be set back from these public rights of way and recreation ground and new, well-vegetated buffers would be provided to substantially conserve the rural character of these recreational resources. A new belt of woodland on the steep slopes alongside Bridleway 177/Greenhill Lane (Photographs A and B) would help conserve the rural setting of this bridleway, which could be partially diverted through the new woodland in places to enhance its rural character. It would also provide a valuable green infrastructure corridor and habitat link between woodland at Mill Common to the east and woodland in the Crewe’s Lane valley to the west (Figure 2: Wider Landscape Aerial Photograph). Another green infrastructure opportunity would be to provide a new section of bridleway between the northern end of Bridleway 87 and the bridleway that emerges from the Mill Common woodland to the southeast, passing through the additional landscape buffer along the outer edges of the small-scale fields opposite Chelsham Common. The LCSS is incorrect to state that the loss of a green gap between Chelsham and Warlingham would be impossible to mitigate. As outlined above, the open character of both Chelsham and Warlingham could be conserved through the sensitive distribution of housing and open space on the site.</th>
</tr>
</thead>
<tbody>
<tr>
<td>LCSS OVERALL SENSITIVITY JUDGEMENT = 23</td>
<td>SCARP OVERALL SENSITIVITY JUDGEMENT = 18</td>
</tr>
<tr>
<td>LANDSCAPE VALUE FINDINGS FOR WAR 008</td>
<td>LCSS SCORE</td>
</tr>
<tr>
<td>-------------------------------------</td>
<td>------------</td>
</tr>
<tr>
<td>Landscape designations</td>
<td></td>
</tr>
<tr>
<td>The site is within the current AGLV.</td>
<td>3</td>
</tr>
<tr>
<td>Ecological and other designations (e.g. heritage, flood zone etc)</td>
<td></td>
</tr>
<tr>
<td>None known.</td>
<td>1</td>
</tr>
<tr>
<td>Local distinctiveness</td>
<td></td>
</tr>
<tr>
<td>The site has a village green or common feel which is distinctive.</td>
<td>3</td>
</tr>
<tr>
<td>Any historic/cultural/ literary associations</td>
<td>1</td>
</tr>
<tr>
<td>---------------------------------------------</td>
<td>---</td>
</tr>
<tr>
<td>Surrey Historic Landscape Characterisation: 1. FIELD PATTERNS/SYSTEMS 114. ‘Prairie’ fields (large enclosures with extensive boundary loss)</td>
<td>1</td>
</tr>
<tr>
<td>Contribution to setting of ‘outstanding assets’</td>
<td>1</td>
</tr>
<tr>
<td>The site is within the AGLV and does not form a part of a setting to any other outstanding asset.</td>
<td>1</td>
</tr>
<tr>
<td>Recreation and public assets / locally valued spaces</td>
<td>3</td>
</tr>
<tr>
<td>The site has public rights of way around two sides - to the south and east - Bridleway 87 and 177. There is also informal usage of the field by walkers.</td>
<td>3</td>
</tr>
<tr>
<td>Perceptual aspects (eg. scenic quality, tranquillity, and remoteness)</td>
<td>3</td>
</tr>
<tr>
<td>The site has a rural character, with few urban influences.</td>
<td>3</td>
</tr>
<tr>
<td><strong>LCSS OVERALL VALUE JUDGEMENT =</strong></td>
<td>15</td>
</tr>
</tbody>
</table>
5.1.2 Scarp has undertaken a more comprehensive landscape and visual appraisal of the WAR 008 site than that undertaken for the LCSS and has concluded that (1) the LCSS assessment is flawed in some critical aspects and (2) that the WAR 008 site has a much greater capacity to accommodate development on landscape grounds than reported in the LCSS.

5.1.3 In terms of landscape sensitivity, the LCSS has given the WAR 008 site an overall landscape sensitivity judgement of Substantial, scoring 23 out of 35 and falling just within the Substantial range of 22-28. Scarp considers that the sensitivity of the site landscape has been over-estimated, primarily on account of the LCSS not identifying housing along Farleigh Road as part of Warlingham, by not fully identifying the relationship between settlement pattern and topography and by not fully recognising the significant potential for mitigation available through sensitive development master-planning. Scarp has given an overall landscape sensitivity judgement of Moderate, scoring 18 out of 35 and falling within the Moderate range of 15-21.

5.1.4 In terms of landscape value, the LCSS has given the WAR 008 site an overall landscape value judgement of Moderate, scoring 15 out of 35 and again falling just within the Moderate range of 15-21. Scarp has given an overall landscape value judgement of Slight, scoring 13 out of 35 and falling within the Slight range of 08-14. We disagree with the assessment scores for ‘Local Distinctiveness’ and ‘Recreation and public assets / locally valued spaces’ for the reasons stated in Table 4.1 above.

5.1.5 On the basis of the above Scarp assessment, the landscape capacity of the WAR 008 site is Medium /High rather than the Low capacity erroneously assessed in the LCSS.

6.0 WAR 011 LANDSCAPE CAPACITY AND SENSITIVITY REVIEW

6.1.1 A commentary is provided below on the WAR 011 assessment findings and the scores attributed to each of the assessment criteria used in the LCSS for determining landscape sensitivity and landscape value. Reasoned justifications are provided where the Scarp assessment scores differ from those identified in the LCSS.
### TABLE 4.2: REVIEW OF LANDSCAPE SENSITIVITY AND VALUE FINDINGS FOR WAR 011

<table>
<thead>
<tr>
<th>Inherent landscape quality (intactness and condition)</th>
<th>LCSS SCORE</th>
<th>SCARP APPRAISAL</th>
<th>SCARP SCORE</th>
</tr>
</thead>
<tbody>
<tr>
<td>The site is made up of a field, used for horse grazing, and an area of regenerated scrub which is open in parts. The field is well contained with a substantial native hedge with native trees and shrubs. Urban Agricultural Land Classification.</td>
<td>2</td>
<td>Areas of scrub have been cleared although peripheral tree/shrub vegetation remains intact.</td>
<td>2</td>
</tr>
</tbody>
</table>

### Ecological sensitivity

<table>
<thead>
<tr>
<th></th>
<th>LCSS SCORE</th>
<th>SCARP APPRAISAL</th>
<th>SCARP SCORE</th>
</tr>
</thead>
<tbody>
<tr>
<td>There are some mature trees within the boundary hedgerow, plus native trees including holly and hawthorn.</td>
<td>1</td>
<td>Noted.</td>
<td>1</td>
</tr>
</tbody>
</table>

### Inconsistency with existing settlement form/pattern

<table>
<thead>
<tr>
<th></th>
<th>LCSS SCORE</th>
<th>SCARP APPRAISAL</th>
<th>SCARP SCORE</th>
</tr>
</thead>
<tbody>
<tr>
<td>Warlingham developed on the slopes between valleys. The settlement to the north has developed on slopes up to the small valley bottom along the northern edge of Warlingham. This is defined by public rights of way which mark the edge of settlement. The site runs up to this public right of way and so would be consistent with the development pattern. The site is adjacent to the settlement boundary.</td>
<td>2</td>
<td>As identified in Table 4.1 above, the existing settlement occupies both ‘flat’ slopes and valleys. Housing along Farleigh Road to the north forms part of Warlingham and is an integral part of the settlement pattern. Topographical variation in the existing settlement adds to the character and variety of the village. The inclusion of the gently sloping land within the WAR 011 site would also contribute to the distinctiveness of this extended part of the village. The LCSS methodology identifies a site with negligible sensitivity in terms of inconsistency with existing settlement form/pattern as “The site is adjacent to existing settlement and is in keeping with how the settlement has developed in relation to the landscape structure, and</td>
<td>1</td>
</tr>
</tbody>
</table>
the local topography. The adjacent settlement may lack a well-defined existing edge, and have limited vegetation." The site is adjacent to the existing settlement, which has limited vegetation in the rear gardens of properties along Alexandra Road. It is entirely in keeping with how the settlement has developed in relation to the landscape structure and the local topography.

### Contribution to separation between settlements

| Development on this site would contribute to loss of green space between Chelsham and Warlingham and would bring development at Warlingham to the furthest eastern point. However, the site features provide containment and would retain the visual separation between settlements. | 2 | The LCSS methodology identifies a site with negligible sensitivity in terms of contribution to separation between settlements as "The site is distant from any settlement or forms an insignificant part of the wider landscape in between separate settlements. If the site was developed there would be no loss of individual settlement identity". The furthest eastern point on the site is approximately 400m from Chelsham Common. It forms an insignificant part of the wider landscape between Warlingham and Chelsham on account of its location at a relatively low level in a deep valley (Photograph C) where there is a robust framework of peripheral tree/shrub vegetation and additional mature trees along the northern edge of Greenhill Lane. There would be no loss of individual settlement identity if the site is developed. | 1 |

### Contribution to the setting of surrounding landscape/settlement

| The site forms parts of the rural space around Warlingham. However, the site is well contained and has little visual prominence, apart from the vegetation around the boundaries. | 2 | Agreed. | 2 |

### Views (visual sensitivity)

|  |  | 2 | 2 |
There are localised views from housing to the south which is along the edges. Parts of the site are also visible from the field to the north which is within the current AGLV. The site is also visible from the public right of way Greenhill Lane to the north.

<table>
<thead>
<tr>
<th>Potential for mitigation (inverse score i.e. high potential for mitigation = low sensitivity, therefore low score)</th>
</tr>
</thead>
<tbody>
<tr>
<td>It would not be possible to mitigate loss of green space between Chelsham and Warlingham, although this loss is slight. There would be effects on the rurality of the public right of way to the north, although these should be mitigated by retaining boundary vegetation.</td>
</tr>
<tr>
<td>2</td>
</tr>
</tbody>
</table>

LCSS OVERALL SENSITIVITY JUDGEMENT = 13

SCARP OVERALL SENSITIVITY JUDGEMENT = 11

<table>
<thead>
<tr>
<th>LCSS LANDSCAPE VALUE FINDINGS FOR WAR 011</th>
<th>LCSS SCORE</th>
<th>SCARP APPRAISAL</th>
<th>SCARP SCORE</th>
</tr>
</thead>
<tbody>
<tr>
<td>Landscape designations</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>None although adjacent to the current AGLV designation.</td>
<td>1</td>
<td>Agreed.</td>
<td>1</td>
</tr>
<tr>
<td>Ecological and other designations (e.g. heritage, flood zone etc)</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>None.</td>
<td>1</td>
<td>None known.</td>
<td>1</td>
</tr>
<tr>
<td>Local distinctiveness</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Land north of Greenhill Lane (WAR008) and Land south of Greenhill Lane (WAR011)

**Landscape and Visual Appraisal**

<table>
<thead>
<tr>
<th>Area of scrubby woodland and horse grazing field which is not distinctive in appearance.</th>
<th>1</th>
<th>Agreed.</th>
<th>1</th>
</tr>
</thead>
</table>

**Any historic/cultural/literary associations**

<table>
<thead>
<tr>
<th>Surrey Historic Landscape Characterisation: 10. RECREATION 1007. Major sports fields and complexes</th>
<th>1</th>
<th>Agreed.</th>
<th>1</th>
</tr>
</thead>
</table>

**Contribution to setting of ‘outstanding assets’**

<table>
<thead>
<tr>
<th>The site forms a minor part of the setting to the AGLV through wooded boundaries.</th>
<th>2</th>
<th>Agreed.</th>
<th>2</th>
</tr>
</thead>
</table>

**Recreation and public assets / locally valued spaces**

<table>
<thead>
<tr>
<th>There is no formal or informal access to the site. There is a public right of way along the northern border</th>
<th>2</th>
<th>Agreed.</th>
<th>2</th>
</tr>
</thead>
</table>

**Perceptual aspects (eg. scenic quality, tranquillity, and remoteness)**

<table>
<thead>
<tr>
<th>The site has a high degree of enclosure and the land use is rural in character. Adjoining character of fields to the north is scenic. There is some road noise which impacts on the site.</th>
<th>3</th>
<th>The removal of scrub from the western part of the site has opened up views of existing housing on Alexandra Road (Photograph O), thereby introducing urban influence to the site.</th>
<th>2</th>
</tr>
</thead>
</table>

**LCSS OVERALL VALUE JUDGEMENT = 11 SCARP OVERALL VALUE JUDGEMENT = 10**
6.1.2 Scarp has undertaken a comprehensive landscape and visual appraisal of the WAR 011 site and has concluded that the WAR 011 site has a greater capacity to accommodate development on landscape grounds than reported in the LCSS.

6.1.3 In terms of landscape sensitivity, the LCSS has given the WAR 011 site an overall landscape sensitivity judgement of Slight, scoring 13 out of 35 and falling within the Slight range of 08-14. Scarp considers that the sensitivity of the site landscape has been over-estimated on account of the LCSS not adequately identifying the relationship between settlement pattern and topography and by not fully recognising the negligible sensitivity of the site in terms of contribution to separation between settlements. Scarp has given an overall landscape sensitivity judgement of Slight, scoring 11 out of 35 but still falling within the Slight range of 08-14.

6.1.4 In terms of landscape value, the LCSS has given the WAR 011 site an overall landscape value judgement of Slight, scoring 11 out of 35 and again falling within the Slight range of 08-14. Scarp has given an overall landscape value judgement of Slight, scoring 10 out of 35 and falling within the Slight range of 08-14. We disagree with the assessment score for ‘Perceptual aspects’ for the reasons stated in Table 4.2 above.

6.1.5 The Scarp assessment is in agreement with the High landscape capacity assessment for the WAR 011 site, as identified in the LCSS.
7.0 CONCLUSIONS

7.1.1 Scarp has undertaken comprehensive landscape and visual appraisals of WAR 008 and WAR 011, and a critical review of the findings of the LCSS in relation to these two sites. The Scarp review reaches the following conclusions for each of the two sites:-

**WAR 008 site**

7.1.2 In terms of landscape sensitivity of the WAR 008 site, the LCSS has given the site an overall landscape sensitivity judgement of Substantial, scoring 23 out of 35. Scarp considers that the sensitivity of the site landscape has been over-estimated, primarily on account of the LCSS not identifying housing along Farleigh Road as part of Warlingham, by not adequately identifying the relationship between settlement pattern and topography and by not fully recognising the significant potential for mitigation available through sensitive development master-planning. Scarp has given an overall landscape sensitivity judgement of Moderate, scoring 18 out of 35.

7.1.3 In terms of landscape value of the WAR 008 site, the LCSS has given the site an overall landscape value judgement of Moderate, scoring 15 out of 35. Scarp has given an overall landscape value judgement of Slight, scoring 13 out of 35. The difference in scoring relates to an over-estimation of the scores for ‘Local Distinctiveness’ and ‘Recreation and public assets / locally valued spaces’ in the LCSS assessment.

7.1.4 Scarp concludes that the landscape capacity of the WAR 008 site is Medium /High capacity rather than the Low capacity assessed in the LCSS. On this basis, the site should be considered for allocation in the Local Plan going forward.

**WAR 011 site**

7.1.5 Scarp has undertaken a comprehensive landscape and visual appraisal of the WAR 011 site and has concluded that the WAR 011 site has a greater capacity to accommodate development on landscape grounds than reported in the LCSS.
7.1.6  In terms of landscape sensitivity of the WAR 011 site, the LCSS has given the site an overall landscape sensitivity judgement of Slight, scoring 13 out of 35. Scarp considers that the sensitivity of the site landscape has been over-estimated on account of the LCSS not adequately identifying the relationship between settlement pattern and topography and by not fully recognising the negligible sensitivity of the site in terms of contribution to separation between settlements. Scarp has given an overall landscape sensitivity judgement of Slight, scoring 11 out of 35.

7.1.7  In terms of landscape value of the WAR 011 site, the LCSS has given the site an overall landscape value judgement of Slight, scoring 11 out of 35. Scarp has given an overall landscape value judgement of Slight, scoring 10 out of 35. The difference in scoring relates to an over-estimation of the scores for ‘Perceptual aspects’ in the LCSS assessment.

7.1.8  The Scarp assessment is in agreement with the High landscape capacity assessment for the WAR 011 site, as identified in the LCSS. On this basis, the site should be considered for allocation in the Local Plan going forward.
Figures
The Charities

Land north (WAR008) and south (WAR011) of Greenhill Lane
LAND NORTH (WAR008) AND SOUTH (WAR011) OF GREENHILL LANE

The Charities

Land north (WAR008) and south (WAR011) of Greenhill Lane

NTS

Client
Project
Dwg Title
Dwg No
Key
Notes

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Ordnance Survey 0100031673

Figure 2: Wider landscape Aerial Photograph

Warlingham Parish boundary
Site boundaries

Scarp environmental planning
landscape architecture

Hamsey Golf Course
Warlingham Golf Course
London to Caterham Railway
Chelsham Road
Great Park
Limpsfield Road
Farleigh Road

Notes

Chelsham
Hamsey Green
Whetlefe

Warlingham Parish boundary
Site boundaries

Key
LAND NORTH (WAR008) AND SOUTH (WAR011) OF GREENHILL LANE

The Charities

Land north (WAR008) and south (WAR011) of Greenhill Lane

Figure 3: Landform and Topography

Key:

- Site boundaries

Legend:

- Contour intervals: 10
- Color scale: 0 to 175

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Scarp

Environmental Planning
Landscape Architecture
The Charities

Land north (WAR008) and south (WAR011) of Greenhill Lane

NTS

Client
Project
Dwg Title
Dwg No

Key

Scarp
landscape architecture

Environmental Planning

Crown copyright and database rights (2016)

Ordnance Survey 0100031673

Figure 4: Photographic Viewpoint
Locations Plan
Appendix A
Photographs
The Charities

Land north (WAR008) and south (WAR011) of Greenhill Lane

- Photograph A: View looking west from western end of Greenhill Lane (Bridleway 177)
- Photograph B: View looking east from western end of Bridleway 177
The Charities
Land north (WAR008) and south (WAR011) of Greenhill Lane

Site Appraisal and Site Context

Photographs Photosheet 2

- Photograph D
  View looking northeast from central section of Bridleway 87

- Photograph C
  View looking southeast from footpath along edge of Farleigh Road

- Photograph B
  Agricultural shed on southern side of WAR011

- Photograph A
  Housing at Alexandra Road

- Photograph E
  Housing on northern side of Harrow Road

- Photograph F
  Housing at former Warlingham Park Hospital

- Photograph G
  Water tower at former Warlingham Park Hospital

- Photograph H
  Site Appraisal and Site Context

Scarp
landscape architecture
environmental planning

NOTES:
- Photographs Photosheet 2
- Site Appraisal and Site Context
- Photographs Photosheet 2

NTS
Dec 2016
Land North (WAR008) and South (WAR011) of Greenhill Lane

The Charities

LAND NORTH (WAR008) AND SOUTH (WAR011) OF GREENHILL LANE

Photograph E
View looking south along Harrow Road

Photograph G
View looking south along Harrow Road

Photograph F
View looking north along Harrow Road

Photograph D
Housing on northern side of Harrow Road

Photograph B
Housing on southern side of Harrow Road

Photograph A
View looking northwest towards WAR 008 from Chesham Road
The Charities

Land north (WAR008) and south (WAR011) of Greenhill Lane


Client

Project

Dwg Title

Dwg No

Photograph H

View looking northwest from central section of Greenhill lane (bridleway 177)

Photograph I

View looking north from western end of Greenhill lane (bridleway 177)

Site Appraisal and Site Context

Photographs Photosheet 4

Roofs of housing along Farleigh Road (northern section)

Trees along northern edge of WAR011

Housing at Farleigh Road (northern section)

Greenhill Lane

Housing at Farleigh Road

Trees along northern edge of WAR011

Road (northern section)
LAND NORTH (WAR008) AND SOUTH (WAR011) OF GREENHILL LANE

The Charities

LAND NORTH (WAR008) AND SOUTH (WAR011) OF GREENHILL LANE

Photograph K

View looking northeast along Chesham Road (2)

Photograph L

View looking west towards WAR 008 from northern part of Chesham Common (outside the Coach House public house)

Site Appraisal and Site Context

Photographs Photosheet 5

Photograph J

View looking northeast along Chesham Road (1)

Photograph I

View looking northeast along Chesham Road (1)

Photograph H

View looking northeast along Chesham Road (2)

Photograph G

View looking northeast along Chesham Road (2)

Photograph F

View looking northeast along Chesham Road (1)

Photograph E

View looking northeast along Chesham Road (1)

Photograph D

View looking northeast along Chesham Road (1)

Photograph C

View looking northeast along Chesham Road (1)

Photograph B

View looking northeast along Chesham Road (1)

Photograph A

View looking northeast along Chesham Road (1)

Photograph N

View looking northeast along Chesham Road (1)

Photograph M

View looking northeast along Chesham Road (1)

Photograph L

View looking west towards WAR 008 from northern part of Chesham Common (outside the Coach House public house)

Site Appraisal and Site Context

Photographs Photosheet 5

Photograph J

View looking northeast along Chesham Road (1)

Photograph I

View looking northeast along Chesham Road (2)

Photograph H

View looking northeast along Chesham Road (2)

Photograph G

View looking northeast along Chesham Road (2)

Photograph F

View looking northeast along Chesham Road (2)

Photograph E

View looking northeast along Chesham Road (2)

Photograph D

View looking northeast along Chesham Road (2)

Photograph C

View looking northeast along Chesham Road (2)

Photograph B

View looking northeast along Chesham Road (2)

Photograph A

View looking northeast along Chesham Road (2)

Photograph N

View looking northeast along Chesham Road (2)

Photograph M

View looking northeast along Chesham Road (2)
The Charities

Land north (WAR008) and south (WAR011) of Greenhill Lane

NTS

Client
Project
Dwg Title
Dwg No

Photograph M
View looking west towards WAR 008 from Chesham Road

Photograph N
View looking north towards WAR 008 from Chesham Road

Site Appraisal and Site Context

Photographs Photosheet 6

Bushy hedgerow on western side of appeal site

Housing on northern side of Harrow Road

Hedgerow with occasional trees along eastern boundary of WAR008

Heathfi eld Cottages on northern side of Chelsham Common

Hedgerow with trees and access road

Heathfi eld Cottages on northern side of Chelsham Common
View of horse paddock in eastern part of WAR 011

View of pond in western part of WAR 011 and housing along western site boundary

Housing on Alexandra Road

Paddock in WAR 011

Photograph O

Photograph P
21 December 2016

Planning Policy
Tandridge District Council
Council Offices
8 Station Road
Oxted
Surrey
RH8 0BT

Dear Sir or Madam,

TANDRIDGE DISTRICT COUNCIL – LOCAL PLAN: SITES CONSULTATION
LAND NORTH OF GREENHILL LANE (WAR 008) AND LAND SOUTH OF GREENHILL LANE (WAR 011)

These representations have been prepared on behalf of The British Home & Hospital for Incurables, Macmillan Cancer Support, The Royal Alfred Seafarers’ Society, Royal London Society for Blind People and the Royal National Lifeboat Institution, thereafter referred to as “The Charities”.

The Charities are the freehold owners of two strategic development sites identified in The Local Plan: Sites Consultation document (“the Sites Consultation document”) as Land north of Greenhill Lane (WAR 008) and Land south of Greenhill Lane (WAR 011).

This representation responds to the Council’s current consultation in relation to the Sites Consultation document and the accompanying documents and technical assessments.

Specifically these representations are submitted to address the conclusions reached in the Sites Consultation document in relation to the Charities land including that:

- We object that land north of Greenhill Lane (WAR 008) should be discounted and not be considered appropriate for development moving forward; and
- We support land south of Greenhill Lane (WAR 011) remaining subject to further assessment.

These representations provide a detailed analysis of the development capacity of the sites. They have been informed by a detailed Landscape and Visual Appraisal of both sites that was been undertaken by landscape consultants Scarp. A copy of their appraisal is provided with this representation at Appendix 1.

Following Officer review and consideration of these representations, and the issues and evidence contained herein, we would like to arrange a meeting with officers to discuss the emerging masterplan concepts and the emerging policy context in relation to these two sites.
THE SITES

Both sites are located in the village of Warlingham.

Land north of Greenhill Lane is the larger of the two sites (33.15 ha) and is situated on the north eastern edge of the built-up area of Warlingham. The Council identify this site as WAR 008.

Land south of Greenhill Lane (1.71 ha) is located to the south of WAR 008 and is a grazing field. The Council identify this site as WAR 011.

With regard to relevant policy designations, the sites are located within the Green Belt. WAR 011 is also identified as forming part of an Area of Great Landscape Value Policy (Core Strategy Policy CSP 20 (Areas of Outstanding Natural Beauty)).

The Charity’s two sites, together with sites WAR 018 (Land adjacent to Kennel Farm) and WAR 023 (Land at Alexandra Avenue), represent a significant opportunity for housing delivery for the Council. The Charities are currently engaging with the landowners of parcels WAR 018 and WAR 023 to explore the opportunities for a joint masterplan approach to bring forward these four strategically important sites.

Notwithstanding this, all four sites are capable of being taken forward independently from each other. The Charities wish to make it clear that although they are the landowners in relation to both WAR 008 and WAR 011 the sites should continue to be considered and assessed as standalone sites.

DEVELOPMENT PROPOSALS

The Charities consider that their sites can deliver a significant number of residential dwellings while providing public open space on what is currently private land. Providing public access and routes across the sites would be a key element of any masterplan proposal and would be consistent with national planning policy for Green Belt sites. The provision of public open space would also provide long term control over the public use of this land.

Our client has begun initial conversations with officers regarding the development of the sites. So far, there has been a meeting with Planning Officer Tai Kleiman in June 2016. Initial feedback was broadly supportive.

As requested at the meeting the Charities provided the Council with a Transport Appraisal on 29th July in relation to both sites. This appraisal was prepared by Vision Transport Planning and demonstrated how both sites could be accessed and serviced. No further information was subsequently requested on any matters and we are therefore confident there are no impediments to bringing the sites forward for redevelopment other than those identified by the Council which we are confident are all resolvable.
A. Housing Trajectory and the Council’s Approach

On behalf of the Charities, Montagu Evans submitted detailed representations on the Council’s proposed delivery strategy as set out in the first stage of local plan consultation. This consultations took place between December 2015 and February 2016 and our representations where given Comment ID’s 3339 and 3340.

Although the Sites Consultation document does not specifically address the Council’s proposed delivery strategy we wish to highlight again these earlier representations as they are fundamental to the soundness of the emerging Local Plan. For brevity we do not repeat these in full at this time.

We consider that only one of the Council’s proposed approaches is capable of accommodating the Objectively Assessed Housing Need. Our analysis shows that Approach 5, which involves the release of sites for housing that are in the Green Belt around the main settlements, is the only Approach capable of delivering the Council’s minimum housing requirement of 470 dwellings per annum, with ‘headroom’ to reflect the affordability problems in the district.

B. Land North of Greenhill Lane (WAR 008)

The Site Consultation document proposes that WAR 008 should no longer be considered for allocation in the Local Plan going forward as it has “a low capacity to accommodate development on landscape grounds.” We strongly disagree with this conclusion which we consider has been made on the basis of inaccurate and flawed evidence and therefore object to the conclusion currently drawn on this site.

Turning to each of the evidence documents.

**Housing and Economic Land Availability Assessment (HELAA), 2016**

The site was considered to be developable and capable of coming forward after 5 years, should the site be allocated in the Local Plan.

The site was given an estimated yield of 600 units at an average of 18 dph.

**Green Belt Assessment Part 2**

WAR 008 was not fully assessed in the Green Belt Assessment Part 2 as not all of the site falls within the nearest assessed area, Area 003. Further, the area that was assessed is significantly wider than the extent of WAR 008 and encompasses many different typologies of land.
In relation to Area 003 the Council have stated the following:

- Historically, the part of the Area now known as Great Park served as a hospital and redevelopment was allowed on appeal on the basis that it would not have any greater impact upon the openness of the Green Belt. The redevelopment represents a notable level of development within the Green Belt and can be viewed as encroachment upon the countryside. We note that the Clock Tower, which sits in the centre of the Great Park development, is visible from WAR 008.
- In the light of this, and the age of built form within this Area, the assessment states that the Green Belt has prevented further sprawl of built-up areas and encroachment into the countryside.
- Chelsham is a settlement although with no services and with a dispersed character, aside from Great Park. It is considered that the wider area serves effectively in preventing Warlingham from merging with Chelsham.
- In addition to serving purposes 1 and 3, this area effectively serves Green Belt purpose 2 in preventing Warlingham from merging with Chelsham.
- Furthermore, the character of this Area for Further Investigation remains open and undeveloped in its appearance.
- In light of the above, the Council concludes that this Area should not be considered further as part of the Green Belt Assessment.

On the basis of the above assessment the Council considers that WAR 008 is located within an area of Green Belt that effectively serves the purposes of including land within it. Specifically, they consider that WAR 008:

1. prevents the unrestricted sprawl of large built-up areas;
2. prevents neighbouring towns merging into one another (Warlingham and Chelsham); and
3. assists in safeguarding the countryside from encroachment.

We disagree that WAR 008 serves purposes 1 and 3. The site is surrounded by development on all sides with development along Farleigh road to the west, Greenhill Lane to the south, Harrow Road and Great Park to the north and Chelsham to the east. The site effectively sits as an island surrounded by the existing built development that makes up the settlement of Warlingham. It does not prevent sprawl nor does it safeguard from encroachment.

Further, the site does not provide or form part of a defensible boundary to this part of the Green Belt. A more defensible boundary could be provided along Chelsham Road through the release of the site for redevelopment and appropriate masterplanning.

We also disagree with the Council’s conclusion in relation to purpose 2. Chelsham is a very small settlement which the Council describe in the GBA Part 2 as having no services and a dispersed character. It is not a neighbouring town and is already part of Warlingham through the Great Park development and residential dwellings along Harrow Road. It is already very difficult to distinguish a boundary or separation between Chelsham and Warlingham.
Accordingly, we request that the Council reconsider their appraisal and conclude that WAR 008 does not serve any of the purposes of Green Belt land.

**Landscape Capacity for Development**

The Council’s main stated reason for not taking WAR 008 forward is that in their opinion it has “a low capacity to accommodate development on landscape grounds.” This opinion is based on evidence set out in their Landscape Capacity and Sensitivity Study (2016) (LCSS).

The Council consider that the site is sensitive due to its inconsistency with the existing settlement form / pattern, its contribution to the separation with Chelsham and its low potential for successful mitigation.

Following review of the Council’s landscape evidence, the Charities instructed landscape consultants Scarp to carry out a detailed appraisal of the landscape sensitivity and value of WAR 008. Scarp have undertaken a more comprehensive landscape and visual appraisal of the WAR 008 site than that undertaken for the LCSS. Their findings are that;

1. the LCSS assessment is flawed in some critical aspects; and
2. that the WAR 008 site has a much greater capacity to accommodate development on landscape grounds than reported in the LCSS.

Within Section 5 of Scarp’s appraisal an analysis has been provided on the WAR 008 assessment findings. Scarp have attributed scores to each of the assessment criteria used in the LCSS for determining landscape sensitivity and landscape value. Reasoned justifications are provided where the Scarp assessment scores differ from those identified in the LCSS.

**Landscape Sensitivity**

In terms of landscape sensitivity, the LCSS has given the WAR 008 site an overall landscape sensitivity judgement of Substantial, scoring 23 out of 35 and falling just within the Substantial range of 22-28.

Scarp considers that the sensitivity of the site landscape has been overestimated, primarily on account of the LCSS;

i. not identifying housing along Farleigh Road as part of Warlingham;
ii. not fully identifying the relationship between settlement pattern and topography; and
iii. not fully recognising the significant potential for mitigation available through sensitive development master-planning.

Scarp has given an overall landscape sensitivity judgement of Moderate, scoring 18 out of 35 and falling within the Moderate range of 15-21.
Landscape Value

In terms of landscape value, the LCSS has given the WAR 008 site an overall landscape value judgement of Moderate, scoring 15 out of 35 and again falling just within the Moderate range of 15-21.

Scarp has given an overall landscape value judgement of Slight, scoring 13 out of 35 and falling within the Slight range of 08-14.

The difference in scoring relates to an over-estimation of the scores for ‘Local Distinctiveness’ and ‘Recreation and public assets / locally valued spaces’ in the LCSS assessment.

Ecology Assessment

The Site-Based Ecology Assessment concludes that the site is suitable for development. It concludes that given the scale of the site, protection and enhancement of existing hedgerows and boundaries should be readily achieved through a masterplanned approach to green infrastructure.

As the site is extensive and appears to have some interest for farmland birds, the study recommends that it would be appropriate to create and/or retain some lowland meadows as part of the green infrastructure, especially along the eastern fringe, although it is recommended that site surveys would inform detailed design of open spaces.

It assumes that as the whole site is 33.15ha and would presumably be used for family housing, a general development density of 30dph could be assumed. However, the final developable area would depend on how much public open space and other community facilities were required.

It concludes that on the basis that about 10% of the site might be dedicated to ecological networks over and above normal public open space requirements that can be incorporated into the 30dph density, a yield of up to 900 units might be expected.

The above is noted and we reserve the right on behalf of the Charities to submit detailed ecology evidence in relation to this when surveys can next be carried out.

Conclusion in relation to WAR 008 and the Sites Consultation Document

The Council’s evidence base and its assessment of WAR 008 is flawed in some critical aspects.

The detailed appraisal carried out by Scarp concludes that the sensitivity of WAR 008 has been over-estimated. The Council have erroneously given WAR 008 an overall landscape sensitivity judgement of Substantial, scoring 23 out of 35. Scarp’s more detailed appraisal shows that the sensitivity judgement should be Moderate, with a score of 18 out of 35.

In terms of landscape value of the WAR 008 site, the LCSS has over-estimated scores in relation to ‘Local Distinctiveness’ and ‘Recreation and public assets / locally valued spaces’. Scarp has given an overall
landscape value judgement of Slight, scoring 13 out of 35 against the LCSS judgement of Moderate and score of 15 out of 35.

Accordingly the landscape capacity of the WAR 008 site is Medium / High capacity rather than the Low capacity assessed in the LCSS and incorrectly relied upon in the Sites Consultation Document.

On this basis, the site should be considered for allocation in the Local Plan going forward. To further inform this process we will be progressing our masterplanning work building on the landscape assessment masterplan produced by Scarp. This clearly identifies the area that we consider should be free from development and potentially handed over as public open/recreational space for the wider benefit of the community. This land can also help deliver significant ecological and biodiversity benefits.

C. Land South of Greenhill Lane (WAR 011)

The Site Consultation document proposes that this site should continue to be considered but that further evidence is needed before a conclusion can be reached.

We agree with the conclusion that the site should continue to be considered, but wish to provide more detailed evidence to ensure that the site’s full development capacity can be considered.

Turning to each of the evidence documents.

Housing and Economic Land Availability Assessment (HELAA), 2016

WAR 011 was considered to be developable and capable of coming forward after 5 years. It was given an estimated yield of 50 units (29 dph).

Green Belt Assessment Part 2

WAR 011 forms part of Area 003 and we have set out the Council’s conclusions on this area above.

It is again important to note that the Council have undertaken their assessment in relation to an area much wider than the extent of site WAR 011 and this has resulted in an accurate assessment of the merits of WAR 011 on its own.

We disagree with the Council’s assessment in relation to purposes 1 (restrict sprawl) and 3 (safeguarding the countryside from encroachment). The site is bounded by development to the west, east and south and it’s boundary with Greenhill Lane visually serves as the edge of the built up area of Warlingham. The site does not serve any purpose in relation to restricting sprawl and encroachment.

We also disagree with the Council’s conclusion in relation to purpose 2 (merging of neighbouring towns) for the reasons set out above.
We request that the Council reconsider their appraisal and conclude that WAR 008 does not serve any of the purposes of Green Belt land.

**Landscape Capacity for Development**

The Council’s LCCS states that the site is relatively unconstrained and has a high landscape capacity to accommodate housing development in the wider landscape, provided its form is closely related to and in scale with the adjacent settlement.

Scarp’s more detailed landscape and visual appraisal of WAR 011 concludes that it has a greater capacity to accommodate development on landscape grounds than reported in the LCSS.

**Landscape Sensitivity**

In terms of landscape sensitivity, the LCSS has given the WAR 011 site an overall landscape sensitivity judgement of Slight, scoring 13 out of 35 and falling within the Slight range of 08-14.

Scarp considers that the sensitivity of the site landscape has been over-estimated on account of the LCSS;

1. not adequately identifying the relationship between settlement pattern and topography; and
2. not fully recognising the negligible sensitivity of the site in terms of contribution to separation between settlements.

Scarp has also given an overall landscape sensitivity judgement of Slight, but a score of 11 out of 35 within the Slight range of 08-14.

**Landscape Value**

In terms of landscape value, the LCSS has given the WAR 011 site an overall landscape value judgement of Slight, scoring 11 out of 35 and again falling within the Slight range of 08-14.

Scarp has given an overall landscape value judgement of Slight, scoring 10 out of 35 and falling within the Slight range of 08-14.

The minor disagree relates to the assessment score for ‘Perceptual aspects’ for the reasons stated in Table 4.2 of Scarp’s report.

**Ecology Assessment**

The Site-Based Ecology Assessment concludes that a part of WAR 011 is ecologically sensitive. Approximately half of the site is considered to have neighbourhood interest. However the assessment acknowledges that, pending further surveys, that part may be open to partial development, with retention of semi-natural areas that contribute to local ecological networks particularly along Greenhill Lane.
There has recently been management works in relation to this part of the site in order to clear brambles and other vegetation of limited ecological value. Following this, and when the relevant survey windows open, we reserve the right to submit ecology assessments to provide further and more detailed information on the then current ecological sensitivities at WAR 011.

Conclusion in relation to WAR 008 and the Sites Consultation Document

Scarp’s assessment is in agreement with high landscape capacity assessment for WAR 011 as identified in the LCSS. On this basis, WAR 011 should be considered for allocation in the Local Plan.

However, we consider that WAR 011 has a greater capacity to physically accommodate development than indicated in the Sites Consultation document. This is due to reliance on an out of date ecological assessment that does not reflect the historical extent of vegetation cover on the site which previously restricted the accuracy of the Council’s surveys.

As it is not currently possible to undertake the relevant survey work for seasonal reasons, we reserve the right to submit evidence in relation to this. We intend to submit an up-to-date ecology assessment as soon as possible after the relevant survey windows open in order to provide a true assessment of ecological conditions on the site.

CLOSING

We trust that these comments are useful at this stage. By way of this letter we reserve the right to comment on further rounds of consultation and attend the Examination in Public on behalf of our client. We look forward to receiving details of this in due course.

Should you wish to meet to discuss the above in any further detail, or if you require any further information or clarification, please do not hesitate to contact Will Edmonds or Sam Dalzell at this office.

Yours faithfully

WILL EDMONDS
PARTNER
MONTAGU EVANS LLP

Encs.