Examination Statement

Tandridge Local Plan

Matter 4

For Wates Developments, Land Group and others

Client: Wates Developments Land Group and others
Date: September 2019
Ref: 1183415
Introduction

We represent Wates Developments Limited (WD). WD, with others, has land interests adjoining the built-up area of Hurst Green. The company and the others, combined known as the Holland Park Consortium, have been active in making representations at every stage of the local plan process. WD and Land Group Limited are also part of the Tandridge Housing Forum (THF) which is making Examination Statements on various Matters. WD and Land Group are in full agreement with the THF Statements.

Matter 4 Green Belt boundary alterations

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

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

4.2 In terms of paragraph 84 of the Framework, have the proposed alterations to the Green Belt boundaries taken account of the need to promote sustainable patterns of development and are they consistent with the Local Plan strategy?

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?

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?
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?

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

General – In our submissions to the Reg 19 Local Plan we criticised the Green Belt Assessment carried out by the Council in detail. We ask that the Inspector considers our earlier comments in conjunction with the below.

4.1 The THF response sets out very clearly how the methodology was not clear nor was it consistent with national planning policy. We support the THF response.

4.2 The answer is “no”. Tandridge District Council has correctly accepted that exceptional circumstances exist and that it is necessary to release Green Belt land for development. Having determined that, paragraph 138 of the NPPF urges Strategic policy making authorities to “promote sustainable patterns of development” and to give first consideration to previously developed land and/or land which is well served by public transport. Allied to this is the Local Plan strategy which seeks to concentrate development at the Tier 1 and Tier 2 settlements, i.e. the most sustainable locations in the District.

This advice has not been followed in the consideration of our clients’ land at Hurst Green (OXT 74). Hurst Green, combined with Oxted, is part of the largest urban area in Tandridge District. Our clients’ land abuts the built-up area boundary and includes elements of previously developed land. Moreover, the site is in close proximity to Hurst Green railway station and there are bus routes in Holland Road and Warren Lane. If the NPPF advice had been followed there can be no doubt that OXT 74 should be included as a Green Belt release.

4.3 Given that exceptional circumstances to release Green Belt land for development are accepted by the Council and given that despite this the Council fails to release sufficient Green Belt land to meet OAHN, it must be assumed that the Council has rigorously explored all urban options. It has to be remembered that very little of the District is non-Green Belt.

4.4 The answer is “no”. In our submission at Reg 19 stage we highlight how the approach has been inconsistent and we draw the comparison between the assessment of SMA 030 and our clients’ site OXT 74. Seemingly, SMA 030 was selected based on the
community benefits it could bring in conjunction with SMA 004, SMA 008 and SMA 040. Such a consideration is not one of the purposes for a Green Belt and therefore is not one of the considerations relevant when assessing Green Belt release of individual sites. This notwithstanding, whilst the Council did place weight on the community benefits SMA 030 could bring, it did not consider the community benefits of our clients’ site OXT 074.

The boundaries of the amended Green Belt are not justified for the primary reason that insufficient sites have been released to meet OAHN. Paragraph 85 of the NPPF2012 sets out what should be done when defining Green Belt boundaries:

**Ensure consistency with the development plan’s strategy for meeting identified requirements for sustainable development** – the OAHN will not be met because insufficient sites are proposed for release from the Green Belt.

**Not include land which it is unnecessary to keep permanently open** – in respect of OXT 74 according to the Green Belt Assessment its release would be contrary to 2 purposes – unrestricted sprawl of large built-up areas and encroachment on the countryside. In respect of sprawl, it has to be remembered that the Metropolitan Green Belt is London’s Green Belt. It is to prevent the sprawl of London that this Green Belt purpose relates to. Development of OXT 74 would have no bearing on the outward sprawl of the built-up area of London. Assisting in the safeguarding of encroachment on the countryside is a purpose which affects the vast majority of sites proposed for release from Green Belt for development.

The site does not have any special landscape or bio-diversity constraints and as such there are no compelling reasons why the land has to be kept permanently open.

**Where necessary, identify areas of safeguarded land between the urban area and the Green Belt, in order to meet longer-term development needs stretching way beyond the plan period** – the Local Plan does not propose any safeguarded land other than the acceptance that South Godstone will deliver homes after the end of the plan period. Of course, not only is the Council not seriously looking beyond the plan period but it is also not looking to meet its development requirements for the plan period.

**Make clear that the safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of safeguarded should only be granted following an update to a plan which proposes the development** – this is standard procedure for safeguarded land.
**Be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period** – as the Local Plan fails to meet identified requirements for sustainable development for the plan period, it will be inevitable that the Green Belt boundaries will need to be altered at the end of the plan period for the shortfall over the plan period to be met.

**Define boundaries clearly, using physical features that are readily recognizable and likely to be permanent** – there are a number of proposed allocations where the boundary has been selected without recognition of any long term physical or natural boundary which are to assist permanency.

**4.5** There are exceptional circumstances for proposing alterations to the Green Belt boundaries, but further alterations are required so that there can be more Green Belt land releases for development to meet OAHN. This is covered in detail in the representations by the THF but I re-iterate, there is an acknowledged acute housing need in Tandridge, the availability of non-Green Belt land is severely limited and without Green Belt releases sustainable development will not be achieved.

The whole approach to Green Belt release lacks cogency. Firstly, the Council determines that exceptional circumstances exist to alter the Green Belt boundaries in order for Green Belt releases for housing. But then for no sound reason it does not release sufficient land to meet the OAHN. This is made more bizarre by the Council choosing not to select perfectly good candidates, such as OXT 74.

**4.6** As mentioned above there appears to be a number of alterations where the boundary is not likely to be permanent or endure beyond the plan period.