MATTER 4: GREEN BELT ALTERATIONS

1. This response to Matter 4 is submitted on behalf of our client, WT Lamb Holdings Ltd.

2. WT Lamb is generally supportive of the emerging Tandridge District Council – Our Local Plan: 2033 (hereafter TDCLP). Their support extends to the alteration proposed to the Metropolitan Green Belt at Lambs Business Park, South Godstone.

3. This participant statement is accompanying by two technical appendices, which are:
   - Appendix 1 – Lambs Business Park Site Specific Green Belt Assessment; and

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?

Question 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. The methodology employed by Tandridge District Council (hereafter TDC) is set out in their evidence base.

5. TDC rightfully identifies that neither national planning policy or guidance establishes a prescribed or uniform methodology for undertaking a Green Belt assessment. However, they rightfully recognise that an assessment should have regard to, and be consistent with, national planning policy.

6. As such, the methodology employed was developed having strong regard to national planning policy as it relates to Green Belts. It was also influenced by best practice, case law and stakeholder engagement and was also subject of peer review.

7. The methodology adopted an initial three-stage assessment process, which was implemented within the Green Belt Assessment (Part 1).

8. The first stage process involved establishing the assessment areas. Given the significant extent of designation within TDC (94%), the work assessed all of the areas of land within the District currently located within the Green Belt.

9. Initially, the District was divided into three strategic areas. To allow for a more refined assessment,
47 smaller assessment parcels were identified, using physical features such as roads, railways and rivers. In addition, existing settlements were also identified for assessment. The settlement boundaries as defined by the Development Plan were used for the purposes of the assessing each settlement.

10. Reflecting the need for the assessment to be consistent with national planning policy, TDC established that the purpose of the Assessment should be to assess how effectively land within the designation serves the purposes of the Green Belt, as established in para. 80 of the NPPF. Consequently, the second stage of the assessment sought to determine which of the Green Belt purposes were applicable to each area subject of assessment and how effectively each of the purposes are served by these locations.

11. A set of key questions was formed around the Green Belt purposes, against which the three strategic areas and the 47 assessment parcels were assessed. We do not demur from the questions identified for each purpose and the justification for not assessing the areas and parcels against Purpose 5 (to assist urban regeneration, by encouraging the recycling of derelict and other land).

12. As existing settlements contain built development, a different assessment approach was adopted to the strategic areas and assessment parcels. To ensure consistency with national planning policy, a relevant set of considerations was established, which are outlined in Core Document GB6. The questions were formed to determine whether each settlement's location within the Green Belt was necessary in such terms, or whether an alternative planning policy response could be formed to provide the necessary protection from development. Again, this approach and the questions posed are considered to be appropriate and formed a robust basis for the assessment.

13. Having assessed each strategic area, assessment parcel and settlements within the Green Belt in a manner that is entirely consistent with national planning policy, TDC identified a number of 'areas of further investigation' (hereafter AoFI). These areas and settlements were identified as requiring further analysis as they either serve the Green Belt purposes to different degrees (i.e. less or more obviously/effectively).

14. The AoFI were subject of detailed consideration within the Green Belt Assessment (Part 2). The methodology employed in the Part 2 Assessment broadly followed the same approach as the Part 1 Assessment, wherein an assessment of each AoFI was undertaken against a pre-established assessment criteria which was based on national planning policy as it relates to Green Belts, before determining whether each should be subject to further assessment.

15. The sites considered worthy of additional assessment were put forward for consideration in the Part 3 Assessment, wherein material planning considerations formed from the TDCLP’s evidence base were collated and used to form a planning judgement as to whether exceptional circumstances exist to justify their release from the Green Belt and where the necessary amendments are most

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8 Section 6 of Core Document 6.
10 Para. 1.1 of Core Document 14 refers.
11 Section 3 of Core Document GB14.
12 Paras. 3.35 and 3.36 of Core Document GB15.
13 Para. 86 of the NPPF (2012).
14 Para. 7.7.
15 Core Document GB3.
16 See Figure 2 of Core Document GB3.
appropriately undertaken.

16. Given the above, it is considered that the Council’s approach is clear and easily understandable. The assessment criteria adopted at the second stage of both the Part 1 and 2 Assessments which centred around national planning policy,17 are also considered to be consistent with national planning policy as it relates to Green Belts. Our views on the Green Belt Assessment (Part 3) are provided in our response to Question 4.5.

**Question 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?**

17. The proposed alterations to the Green Belt have taken account of the iterative Sustainability Appraisal process. In doing so, and in the context of para. 84 of the NPPF, the alterations help deliver the most sustainable approach for accommodating the District’s development needs18.

18. Relevant to the development proposals at Lambs Business Park, the SA assessed two options for meeting the need for additional employment land. The first involved the identification, protection and intensification of employment sites (Option 1), whilst the second assessed the implications of allocating new employment sites on undeveloped land, or land currently in other uses (Option 2). The SA concluded that identified need for new employment provision could be met from the intensification of existing sites (i.e. Option 1) and therefore Option 2 provided no additional economic benefits but would result in likely adverse environmental effects.19

**Question 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?**

19. During the preparation of the TDCLP, TDC have undertaken a robust and detailed assessment of realistic alternatives to releasing land from the Green Belt. Such considerations, which are outlined in more detail in our response to Question 4.5, include an assessment of potential brownfield land in locations inset from the Green Belt, increasing the density of development in locations inset from the Green Belt and through the Duty to Cooperate process, forming an understanding of whether TDC’s unmet needs could be met in neighbouring authorities.

20. This assessment has demonstrated that taking each scenario alone or in combination, there would be an insufficient quantum of land available to meet development requirements.

21. Consequently, all realistic options have been explored.

**Question 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?**

22. As outlined in our response to Question 4.1, the methodology employed by TDC within their Green

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17 Para. 83 and 86 of the NPPF (2012).
18 Page 173 of Core Document MD4 refers.
19 Page 175 of Core Document MD4.
Belt Assessment is robust.

23. The proposed allocations were selected following a detailed three stage assessment, which involved their objective review against the NPPF’s Green Belt purposes.

24. Initially, they were assessed as part of broader assessment parcels, within which 49 AoFI were identified. These areas were selected as it was considered that they deviated more or less obviously/effectively from the purposes of the Green Belt. As a result of representations received to the Regulation 18 TDCLP consultation and from an Officer workshop an additional 6 AoFI were identified.

25. These 54 AoFI were subject of a more refined and granular study to assess their role in serving the NPPF’s Green Belt purposes, their openness and the contribution each area makes to the wider Green Belt.

26. As a result of this additional assessment, 13 sites were taken forward to the third stage to understand whether the exceptional circumstances existed to warrant releasing each area from the Green Belt. At this stage, wider material planning considerations were taken into account, both at a District and a site-specific level. These considerations are listed in our response to Question 4.5.

27. This site selection process accords with both best practice and the expectations established by case law. In doing so, it is a robust process that has ensured that the proposed alterations to the Green Belt are robust.

**Question 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?**

28. The exceptional circumstances identified by TDC to justify amendments to the Green Belt boundary are provided within Core Document GB1.

29. The work identifies that neither national planning policy or guidance defines the term exceptional circumstances. As outlined in case law, this is a deliberate policy decision to allow decision-makers to form a view on whether exceptional circumstances exist by reaching sound planning judgements based on the circumstances of each case.

30. Given that the term remains undefined, TDC have established a number of assessment criteria, which are based upon both case law and national planning policy. TDC’s assessment rightfully acknowledges that alongside these District wide considerations, there are also site-specific considerations that could also form part of the assessment of whether exceptional circumstances exist.

31. Together, the District and site-specific considerations clearly demonstrate that the exceptional

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20 Para. 8.1 of Core Document GB7 refers.
21 Para. 2.6 of Core Document GB3 refers.
25 Para. 137 of the NPPF refers.
circumstances exist to justify amendments to the Green Belt within TDC. These considerations are summarised in the following paragraphs.

32. **Brownfield and underutilised land**: An analysis of the quantum of development that could be delivered from brownfield sites over the plan period has been undertaken, which has demonstrated that a reliance on this source of supply only would yield an insufficient quantum of development land to meet identified needs. Work undertaken by LRM Planning also reaches similar conclusions.

33. **Density**: During the formation of the Local Plan, several alternative approaches were considered to accommodate the District’s development needs. As identified in the Green Belt Assessment (Part 3), three of the scenarios tested focused only on land located outside the existing boundary of the Green Belt. They tested the quantum of development that could be delivered in these locations at densities of 30 dwellings per hectare (approach 2a) and 70 dwellings per hectare (approach 2b). Approach 2a would have resulted in the development of only 2336 dwellings and 3.2ha of employment land, whilst Approach 2b would have delivered 3403 dwellings and 3.2ha of employment land. Consequently, both scenarios would fall significantly short of meeting the District’s objectively assessed needs of 9400 dwellings between 2013 and 2033.

34. **Neighbouring Authorities**: As demonstrated in the Statements of Common Ground, there does not exist the opportunity for any of TDC’s unmet development needs to be met in neighbouring authorities.

35. **Acuteness/intensity of the objectively assessed need**: Policy CSP2 of the Adopted Core Strategy outlines a housing provision of at least 2500 dwellings between 2006 and 2026. This equates to an annual average provision of at least 125 dwellings.

36. Moreover, since 2013, there have been 1377 dwelling completions, which provides an annual average completion figure of 230 dwellings.

37. In contrast, and as outlined in the TDCLP, the objectively assessed need for housing within TDC is 9400 dwellings between 2013 and 2033 (470 dwellings per annum). This need figure was formed having regard to the methodology outlined in the 2012 version of the NPPF and its accompanying methodology. It was therefore formed without consideration of more up-to-date methods for calculating housing need via the standard method. Whilst it is acknowledged that the TDCLP is being examined against the 2012 version of the NPPF, the application of the standard method for TDC helps to provide an additional understanding of the acuteness/intensity of the need for new housing. Using the standard method, the housing need for TDC would be just under 650 dwellings per annum.

38. In addition, Core Document HSN2 also identifies that there is an annual need for 391 new affordable dwellings in the first five years and 310 new affordable dwellings after (6605 new dwellings in total).

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26 Core Documents HNS7 and page 64 of Core Document MD4 refers.
27 Paras. 5.50 to 5.54 of the Lambs Business Park Exceptional Circumstances Report
28 Core Document SCON6
29 Para. 3.25.
30 Core Documents SDTC1, 2, 3, 4, 5 and 7.
31 Para. 11.6
32 Para. 73.
39. Consequently, given the step change between the existing housing provision outlined in the Adopted Development Plan and recent housing completion rates to more recent assessment of housing needs, it can be concluded that the need for housing within TDC is acute.

40. **The inherent constraints on supply/the availability of land suitable for sustainable development:** The previous consideration related solely to the need to provide new housing within the District, but there are other development pressures that have an impact on the supply and availability of land for development. In addition to new housing, the TDCLP seeks to meet the housing needs of Gypsies, Travellers and Showpeople and identifies a need for additional employment land and premises. There is also a demonstrable need for new waste management capacity within the County. This is demonstrated in the following paragraphs:

41. **Gypsies, Travellers and Showpeople:** As outlined in the TDCLP, there is a need for five additional pitches for Gypsies and Travellers and 21 plots/sites for Travelling Showpeople between 2016 and 2033.

42. **Employment land:** TDC’s evidence base identifies that there is a need for an additional 15.3ha of B-class employment land over the plan period. As an annual requirement, this equates to 0.77ha. As demonstrated in the Green Belt Assessment (Part 3), no new employment land has been delivered since 2013.

43. **Waste Management Capacity:** Surrey County Council is currently preparing a new Waste Local Plan. Whilst the Plan’s strategy expresses a preference towards previously developed land located outside the Green Belt, including existing employment sites, there is a recognition that given the competition from higher-value uses for such sites, there can be no certainty that existing employment sites will provide any additional waste management capacity over the plan period.

44. Accordingly, the evidence base supporting the SWLP determines that without development within the Green Belt, the County’s waste management needs would not be met. Having demonstrated that the exceptional circumstances exist to justify the allocation of sites within the Green Belt, the Waste Planning Authority intends to encourage each Local Planning Authority to consider making appropriate alterations to the Green Belt boundaries to allow for these allocations, as local plans are formed and reviewed. Given the status of Lambs Business Park within the emerging Waste Local Plan, this will be a relevant consideration for TDC.

45. Alongside conventional housing pressures, these additional development pressures are competing for available land that prima facie could deliver sustainable development. TDC rightly contend that sustainable development is most likely to be focused at the Tier 1 and 2 settlements within their Settlement Hierarchy, for it is these settlements that provide the greatest range of services and facilities and public transport opportunities. However, aside from Godstone, all the Tier 1 and 2 settlements are inset from the Green Belt and therefore the development potential of these settlements has already been considered within Scenarios 2a and 2b and it was concluded that an insufficient quantum of non-Green Belt land could be identified to meet demonstrable needs.

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33 Para. 18.33 of the TDCLP.
35 Para. 3.25 and 3.26.
36 Para. 5.3.3.2 of the Surrey Waste Local Plan Submission Version (January 2019).
46. TDC’s evidence base also assessed the environmental and planning policy constraints that could preclude development. These constraints were placed into 2 categories: Tier 1 – constraints that form a major barrier to development; and Tier 2 – constraints that are a significant barrier to development, but where there is a reasonable chance of mitigation. These constraints, which are identified on Figure 4 of the Green Belt Assessment (Part 3), cover large swathes of the District and particularly around some of the most sustainable settlements, including to the east and south of Caterham, to the west of Oxted and Hurst Green; surrounding Limpsfield and to the north and east of Lingfield.

47. Consequently, as correctly concluded within the Green Belt Assessment (Part 3), in overall terms there is an insufficient quantum of unconstrained non-Green Belt land to meet identified competing development pressures.

48. The difficulties of achieving sustainable development without impinging on the Green Belt: A range of alternative development options have been assessed by TDC during the formation of the TDCLP. As identified above, the Council had considered two approaches that did not result in development within the Green Belt (Approaches 2a and 2b). Both options were subject of an assessment through the iterative Sustainability Appraisal (hereafter SA) process, the conclusions of which are summarised below:

49. **Approach 2a (the delivery of extant permissions and the focus for housing delivery on sites in areas inset from the Green Belt and the intensification of existing employment sites in areas inset from the Green Belt):** The approach would deliver 2336 new dwellings and 3.2ha of new employment land, which as demonstrated above is significantly short of identified needs for both land uses. As identified previously, the Council’s OAN for new housing is 9400 dwellings between 2013 and 2033. Additionally, there is a need to provide 15.3ha of new employment land. Consequently, the SA rightfully concluded that the approach would have a significant negative effect on SA Objective 1 (providing sufficient housing to enable people to live in a home suitable for their needs and which they can afford) and 7 (to provide for employment opportunities to meet the needs of the local economy). The approach also scored poorly in relation to Objectives 6 (supporting economic growth), 11 (to reduce flood risk), and 14 (to ensure air quality continues to improve and noise and light pollution are reduced). Concerns were also raised that the resultant small-scale development could increase pressures on services and facilities, which in turn would have a detrimental impact on the health and well-being of the population.

50. **Approach 2b (the delivery of extant permissions and the focus for housing delivery on sites in areas inset from the Green Belt at a density of at least 70 dwellings per hectare and the intensification of existing employment sites in areas inset from the Green Belt):** It was concluded that the Approach would deliver 3403 dwellings and 3.2ha of employment land. Again, this is significantly short of the identified need for new housing and employment land. Consequently, it resulted in significant adverse effects in relation to SA Objectives 1, 7, 11 and 14. It also scored poorly in relation to SA Objectives 6 and 10 (adapting to climate change). As with approach 2a, concerns were also raised that the resultant small-scale development could increase pressures on health care services, which

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37 Core Document SPS4
38 Para. 3.23.
40 Para. 9.1 of Document SSHA18
could have a detrimental impact on the health and well-being of the population.

51. Since the publication of Core Document SSHA18, the Council have re-examined the extent to which identified needs could be met from previously development land located outside the Green Belt. However, as identified within both Core Document GB1\(^{41}\) and HNS2\(^{42}\) the reliance on such sites would still not provide a sufficient quantum of land to meet identified needs. This conclusion is also reached within LRM Planning’s Exceptional Circumstances Report, which is provided at Appendix 2 of this participant statement. This work also concludes that there is a legitimate need to look at sites within the Green Belt to help resolve this under provision.

52. Consequently, it can be concluded the objective of achieving sustainable development within TDC cannot be delivered without the development of land within the Green Belt.

53. In light of the above, several differing approaches have been subject of assessment as part of the iterative SA process. The latest SA\(^{43}\) concludes that approach 7a, which involves a focus of residential development at the Tier 1 and 3 settlements, plus a Garden Village, all of which are delivered at a standard density, is the most sustainable approach when considered across the range of sustainability objectives\(^{44}\). If therefore forms the basis of the TDCLP’s spatial strategy.

54. **The nature and extent of harm to the Green Belt (or those parts of it that would be lost if the boundaries were reviewed):** As outlined in our response to Question 4.1, the purpose of TDC’s Green Belt Assessment\(^{45}\) was to identify how effectively land within the designation serves the five purposes of the Green Belt, as defined in national planning policy. The assessment was undertaken at three spatial geographies: at strategic, parcel and site levels. This has enabled an understanding of the areas of the Green Belt that serve the purposes less obviously/effectively and those that serve the purposes more obviously/effectively.

55. At a site level, an assessment of the each AoFI’s openness (both in terms of the site itself and the wider area), the Green Belt purposes they serve and how well they serve them was undertaken. This enables an understanding of the nature and extent of harm to the Green Belt (including the wider Green Belt) that would result if each AoFI was removed from the designation.

56. The Part 3 Assessment also supplements TDC’s earlier analysis by considering the conditions of the TDC’s Landscape Sensitivity and Capacity Study.

57. **The extent to which the consequent impacts on the purposes of the Green Belt may be reduced to the lowest practicable level:** TDC rightfully acknowledge that in most instances, good design can assist in mitigating impacts on the Green Belt. Such mitigation could include the retention and enhancement of site boundaries. The Council’s assessment for each AoFI considers whether, with the use of mitigation, the impacts of developing each site could be reduced to the lowest practicable level.

58. **Local considerations** – In addition to the more District level considerations, Core Document GB1 also seeks to identify site specific material planning considerations. These site-specific material planning considerations are added together with the more strategic and District wide factors, to understand

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\(^{41}\) Para. 3.29.
\(^{42}\) Section 4.
\(^{43}\) Core Documents MD4-MD7.
\(^{44}\) Core Documents GB3 and GB6.
whether in totality, the circumstances are genuinely exceptional at each site to justify their removal from the Green Belt.

59. The site-specific considerations for Lambs Business Park are outlined in our response to Matter 7.

Question 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?

60. The revised boundary of the Green Belt is shown on the Policies Maps.

61. In the case of Lambs Business Park, the Green Belt boundary is to be amended to remove both the Strategic Employment Site as defined in the existing Development Plan⁴⁶, as well as the former quarry area to the west which has been identified by the emerging Surrey Waste Plan for waste management uses.

62. The boundaries of the allocation are clearly defined by physical features, including the extent of the existing Industrial Estate to the east; the Redhill to Tonbridge Railway line to the north; the extent the former quarry, Maple Wood (a designated SNCI) and dense hedgerow planting and trees to the west; and the extent of the existing Industrial Estate and the quarry to the south, together with dense hedgerow planting and trees. These physical features are recognisable and permanent. They have, for over 100 years, formed a robust frame for the site, within which development has been focused.

63. Accordingly, in the case of Lambs Business Park, the boundaries identified are permanent and capable of enduring beyond the plan period.

LRM Planning
September 2019

⁴⁶ Policy CSP22.
LAND AT LAMBS BUSINESS PARK, SOUTH GODSTONE

Site Specific Green Belt Assessment

Prepared by LRM Planning Limited on behalf of WT Lamb
Report Control

Project: Lambs Business Park

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Appendix 1 – Site Location Plan
1 Introduction

1.1 This Site Specific Green Belt Assessment has been prepared on behalf of WT Lamb, in support of the Development Plan promotion of land at Lambs Business Park, South Godstone, to accommodate two data centres, a renewable biofuel production plant, a combined cycle energy centre and the redevelopment of underutilised areas of the existing Business Park to accommodate higher value and more productive uses. Further information on the proposed development is contained within the accompanying Development Framework Document. The proposed development is located on a site that is currently situated within the Metropolitan Green Belt.

1.2 As indicated within national planning policy, the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open. The essential characteristics of Green Belts are their openness and their permanence. The primary function for the Metropolitan Green Belt is to provide a stretch of mainly open country as near to London as possible, to act as a barrier against the further spread of built development and to provide an area in which people are able to find recreation and enjoyment1.

1.3 Notwithstanding the above, national planning policy does permit, where exceptional circumstances exist, for Green Belt boundaries to be altered through the preparation or a review of a Local Plan.

1.4 In the case of Tandridge District Council, the preparation of its new Local Plan provides an opportunity to review the existing boundaries of the Metropolitan Green Belt within the local authority area. Indeed, given the development pressures in Tandridge District, there is a demonstrable need to amend the boundaries of the Metropolitan Green Belt through this process.

1.5 This assessment has been undertaken using a methodology which focuses on the contribution that Lambs Business Park makes to the Metropolitan Green Belt within Tandridge District. It assesses the site’s contribution to meeting the fundamental aim and the five purposes of a Green Belt, as identified in national planning policy.

1.6 This Report demonstrates that the site makes little contribution to the Metropolitan Green Belt and could be developed in the manner envisaged without either constituting the urban sprawl which Green Belt policy seeks to prevent or harming the primary purpose of the Metropolitan Green Belt.

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1 Para. 2.14 of the Tandridge Local Plan Green Belt Assessment Methodology (2015)
2 Site Description

2.1 The site, identified at Appendix 1, comprises a parcel of land located approximately 1km to the west of South Godstone. It comprises a 13.4ha site and is located wholly within the Metropolitan Green Belt. It is divided into two distinct parcels as follows:

- **The eastern land parcel** is identified as a Strategic Employment Site within the current Development Plan for Tandridge District. There is a distinct difference in the age and the quality of the commercial units within the Business Park. Whilst units to the east and south are modern and meet commercial demands for such space, units to the north and west are largely buildings associated with the former brickworks. From 2018 these units will not satisfy EPC standards and therefore will not be capable of being let. In addition, regardless of the number of years remaining on the lease, WT Lamb will be unable to continue to let these buildings to an existing occupier from 1st April 2023. Accordingly, by 1st April 2023, these buildings will be vacant and redundant. The eastern parcel of land measures approximately 5.4ha; and

- **The western land parcel**, which lies outside the Strategic Employment Site designation, was historically used as a quarry with permission for clay extraction, inert landfill and the importation of aggregates via the rail siding. According to the planning permission, WT Lamb have until 2047 to restore the quarry back to its original condition. This part of the wider site measures some 8ha. Its current use for aggregate recycling and inert waste recovery use means that it currently does not make a contribution to the purposes of the Metropolitan Green Belt.

2.2 A 300m live railway siding located to the north of the quarry area is retained by WT Lamb. In addition to this, the main railway track operated by Network Rail has a further siding of 300m in length which is connected to WT Lamb’s privately-owned siding.

2.3 The site significantly slopes from the northwest towards the south and is bounded by:

- The Reading to Tonbridge Railway Line (including the Channel Tunnel Freight Line) to the north;
- Countryside, which is largely used for agriculture, to the south (although permission exists for the extraction of oil and gas – see Surrey County Council permission 2015/0170);
- Maple Wood and countryside, which is largely used for agricultural purposes, to the west; and
- Fields parcels and residential premises located on Terracotta Road (all of which are in the ownership of WT Lamb) and Ruston Avenue to the east.

2.4 The subject site is well screened by substantial boundary hedges to the west and south, which support a significant number of trees (please refer to the landscape section of the accompanying Development Framework Document). The boundaries to the north and northwest are formed and screened by Maple Wood and a heavily wooded railway embankment. As indicated above, the remaining land in the surrounding environs is open countryside and within agricultural use. Agricultural field boundaries therefore screen views into and out of the site.

2.5 An Area of Great Landscape Value is located to the north of the site, whilst a Site of Nature Conservation is located to the north and west (Maple Wood). Birchen Coppice to the south is a Potential Site of Nature Conservation Importance. Areas of high archaeological potential are located to the south west. These designations are all located outside Lambs Business Park.
3 Previous, Existing and Proposed Uses

Previous Uses

3.1 WT Lamb have controlled the site for over 100 years, having originally purchased the brickworks operations in 1918 to produce traditional roof tiles and bricks made from the local Weald clay, quarried in the site’s western land parcel. The works utilised its privately-owned railway siding to import coal and export bricks and tiles. Given the nature of the quarrying use, the site has been intensively used for industrial manufacturing purposes. The railway therefore has a strong association with the site’s former land uses.

3.2 Over more recent years, the demand for traditional tiles and bricks has lessened and the original brickworks buildings in the Strategic Employment Site have been reused for commercial purposes.

Existing Uses

3.3 The site benefits from several existing uses and extant planning permissions, which allow for continued operations.

3.4 The eastern land parcel, which is wholly located within the Metropolitan Green Belt, is identified as being a Strategic Employment Site within the Adopted Tandridge District Development Plan. As indicated in the previous section, there is a distinct difference in the age and quality of the commercial units within the Business Park, with the units to the east and south being more modern and having successfully met commercial demand for such space.

3.5 Units to the north and west of the Business Park are largely buildings associated with the former brickworks. By virtue of their EPC rating and the inability to viably refurbish the units up to the necessary standards, the vast majority of these units will, by 2023 at the very latest, be vacant and redundant.

3.6 The site also benefits from various extant planning permissions for:
   - Manufacturing facing bricks and thermally treat clay products; and
   - Development of an additional 1,920 sq.m of B1, B2 and B8 uses.

3.7 The western land parcel lies outside the Strategic Employment Site designation. It was historically used as a quarry for manufacturing bricks and tiles and benefits from the following current planning permissions:
   - TA80/675 – The construction of a depot for handling resaleable spent railway ballast and earth; repossessing; and the infill of the void; and
   - TA99/155 – The extraction of clay for the manufacture of bricks until 2040 and the infill of the existing void utilising inert waste by 2047.

3.8 The 1999 planning application included the site subject of the 1980 planning application in its restorations provisions, under the terms of a Section 106 legal agreement. This established the deadline for the restoration of the site as 2047.

3.9 An Environment Agency (hereafter EA) Waste Recovery Permit (WRP) was granted to restore
the Phase 2 area in 2016. A WRP application to restore Phase 4 has recently been submitted to the EA. A WRP application for Phase 3 will follow the restoration of Phases 2 and 4.

3.10 The recovery of silts and aggregates from the Phase 4 area is permitted under EA license EPR/EB3107CQA001. This will ensure that the Phase 4 area is professionally prepared for the receipt of inert waste and restoration material, once the WRP has been granted. Phase 1 has already been restored.

3.11 Both the extant planning permissions, as well as the EA WRP, confirm the western portion of the site’s current use, as an aggregates recycling and an inert waste recovery facility.

Proposed Uses

3.12 Several options for the future of the site have been previously considered by WT Lamb. Based on the significant amount of technical and feasibility work, the favoured option is:

- A c.5,418sq.m combined cycle energy centre (up to 49MWe), incorporating a renewable biofuel production plant;
- 2 no. 9,245 sq.m data centres (over 2-3 storeys), with associated supplementary energy centres (decentralised CCGT);
- The intensification and the redevelopment of underutilised areas of the Business Park to provide higher-value and more productive employment opportunities;
- The use of the former pit areas for flood alleviation and as a nature reserve; and
- Education and learning opportunities to be explored.

3.13 As indicated in the accompanying Development Framework Document, WT Lamb seek the development of an exemplar, market leading, sustainable technology park.

3.14 A summary of each of the proposed uses is provided below.

Data Centres

3.15 The data centres will house computer systems and associated infrastructure. Typically, a data centre will house a large group of networked servers for the remote storage, processing and distribution of personal and corporate electronic data. The data centres will be used to house air handling units required to cool the facility, ICT equipment, ancillary batteries, electrical switch gear, chilled water supplies and generators. Given the nature of the use, data centres are large consumers of power.

The Combined Cycle Energy Centre

3.16 The combined cycle energy centre will be designed as a highly-efficient and decentralised combined heat and power plant (hereafter CHP). It will be powered by either a conventional gas connection, or a combination of gas from a conventional connection and from the consented gas field to the south of Lambs Business Park.

3.17 Using a gas and a steam turbine, the energy centre will produce 49MWe and residual heat. The production of this quantity of electricity will ensure that the power needs of the data centres and the renewable biofuel production plant are met in full, from a decentralised source, without the need for electricity to be provided from the National Grid. Moreover, any residual electricity
will be available to power existing or planned development in the surrounding areas, or it will be sent to the Grid.

3.18 Residual heat (up to 49MWth) produced from the CHP Plant could be used in a number of different ways, including:

- In the renewable biofuel production plant. The residual heat will dry refuse derived fuel (hereafter RDF), via either a water or an air heat exchanger; and / or
- Heat and cool the proposed data centres; and / or
- To heat and cool existing and planned developments in the surrounding area.

Renewable Biofuel Production Plant

3.19 The renewable biofuel production plant will utilise pre-sorted and bundles refuse derived fuel waste (hereafter RDF), imported to the site by rail by a third-party waste operator. WT Lamb are in discussions with a number of third-party waste operators, including the Day Group, who own several rail heads in the South East, with their nearest usable railheads being located within Woking and Salfords. The third-party operator will obtain pre-bundled and sorted RDF waste material to be supplied to their rail sidings for the onward transportation to WT Lamb's rail siding at Lambs Business Park.

3.20 The renewable biofuel production plant will process 150,000 tonnes of waste per year. This will comprise pre-processed commercial and residual wastes.

3.21 The waste handled by the renewable biofuel production plant will be the residual product that is left after processing waste materials via traditional sorting methods, to extract elements that can be usefully recycled (for example metals, suitable grades of plastics and glass). These useful materials are consigned onwards to appropriate recycling facilities.

3.22 Ordinarily, the waste to be handled by the renewable biofuel production plant is unrecyclable and would be sent either to waste recovery facilities or to landfill. Instead, this process will see the waste being recycled to create a biofuel. The pelleted bio-fuel will be distributed via the railway network to end users, where it will be combusted or gasified at existing facilities to create renewable heat and power. Typical customers for the fuel will be the domestic and European cement, steel and coal fired power sectors.

3.23 The plant will contain a number of processing operations to upgrade the waste to a finished fuel product. All waste material will be supplied by a contract to an agreed specification and be processed to form a final fuel product that can be used as an alternative to conventional solid fuels, including coal. The production process shall include the following key stages:

- Initial acceptance and Quality Control;
- Shredding and separation;
- Screening and the removal of any conventional recyclable materials;
- Screening and the removal of contaminants;
- Drying including the use of 6-10MWth of residual heat from the CHP Plant;
- Milling and pelletising;
- Quality control and testing; and
- Onward transportation to end users by rail.
3.24 The reprocessing of waste within the renewable biofuel production plant constitutes a recycling operation and no waste will be combusted or gassified on Lambs Business Park. The waste will be handled at the highest possible point on the Waste Hierarchy.
4 Green Belt Historic and Planning Policy Context

Background

4.1 The first official proposal "to provide a reserve supply of public open spaces and of recreational areas and to establish a green belt or girdle of open space" was made by the Greater London Regional Planning Committee in 1935. Provision for Green Belts was included within the 1947 Town and Country Planning Act and allowed their inclusion in development plans for the first time.

4.2 In 1955, Ministerial Circular 42/55 introduced the concept of Green Belt purposes and the importance of defining clear boundaries. Only 3 purposes were introduced, which were:

- To check the growth of a large built up area;
- To prevent neighbouring towns merging; and
- To preserve the special character of a town.

4.3 Since the publication of the Ministerial Circular, various alterations to national planning policy relating to Green Belts have been made, with the latest iterations being provided within the National Planning Policy Framework (hereafter NPPF). Whilst we are aware that the NPPF has recently been updated, the emerging Tandridge Local Plan will be examined against the 2012 version of the NPPF, in accordance with the provisions provided by para. 214 of the 2019 version. In this context, a summary of national planning policy relating to Green Belts is provided below.

Green Belt Purposes

4.4 National Planning Policy in relation to Green Belt is outlined in Chapter 9 of the NPPF. It:

- Outlines the fundamental aim of Green Belt policy;
- Reaffirms the specific purposes of including land in Green Belt;
- Gives policy a more positive thrust by specifying objectives for the use of land in Green Belts;
- Confirms that Green Belts must be protected beyond the Plan period;
- Advises on defining boundaries and on safeguarding land for longer-term development needs; and
- Maintains the presumption against inappropriate development within Green Belts and refines the categories of appropriate development.

4.5 Paragraph 79 of the NPPF outlines that the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and permanence.

4.6 Paragraph 80 of the NPPF identifies five purposes for including land within the Green Belt. These include:

- To check the unrestricted sprawl of large built-up areas;
- To prevent neighbouring towns merging into one another;
• To assist safeguarding the countryside from encroachment;
• To preserve the setting and special character of historic towns; and
• To assist in urban regeneration by encouraging the recycling of derelict and other urban land.

Defining Green Belt Boundaries

4.7 Para. 83 of the NPPF states that once the general extent of the Green Belt has been established, it should only be altered in exceptional circumstances, through the review of the Local Plan.

4.8 When drawing up or reviewing Green Belt boundaries, local planning authorities should take account of the need to promote sustainable patterns of development. They should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt, or towards locations beyond the outer Green Belt boundary.

4.9 When defining boundaries, local planning authorities should:
• Ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development;
• Not include land which is unnecessary to keep permanently open;
• Where necessary, identify in their plans, areas of ‘safeguarded land’ between the urban area and the Green Belt, in order to meet longer-term development needs;
• Make clear that safeguarded land is not allocated at the present time;
• Satisfy themselves that Green Belt boundaries will not need to be altered at the end of the Development Plan period; and
• Define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.

Inappropriate Development

4.10 Para. 89 of the NPPF describes the construction of new buildings within the Green Belt as inappropriate development. The exceptions to this are buildings related to agriculture and forestry, outdoor sports, recreation and cemeteries, extensions and alterations to existing buildings, replacement buildings, limited infilling in villages and the limited infilling and partial or complete redevelopement of previously developed sites, where there would be no greater impact on the openness of the Green Belt and the purpose of including land within it, than the existing development.

4.11 Para. 91 outlines that elements of many renewable energy projects will comprise inappropriate development. In such cases, developers are required to demonstrate very special circumstances for the development to proceed. Very special circumstances will not exist unless the potential harm to the Green Belt and any other harm, is clearly outweighed by other considerations, including the wider environmental benefits associated with the increased production of energy from renewable sources.
Local Historical Context

4.12 The designation of the Metropolitan Green Belt within Surrey was first introduced as part of the 1958 Surrey Development Plan. The purpose for introducing the designation at that time was to create:

“...a stretch of mainly open country as near as possible to London, to act as a barrier against further outward spread of building development and to provide an area in which people now living in the overcrowded districts can find recreation and enjoyment” (Part 2, Paragraph 10).

4.13 The Green Belt boundary proposed through the 1958 Surrey Development Plan remained for a considerable period of time. For Tandridge District, the boundary was first adjusted in 1986. Since 1986, only minor amendments to the larger settlements within the District have been made and none since 2001. For South Godstone, its settlement boundaries have remained the same since the South of the Downs Local Plan 1986.

Local Planning Policy – Tandridge District

4.14 The Green Belt within Tandridge District forms part of the Metropolitan Green Belt which covers a substantial part of the South East and East of England Regions, surrounding London. Para. 2.2 of the Adopted Core Strategy states that about 94% of Tandridge District falls within the Metropolitan Green Belt.

4.15 Section 10 of the Tandridge Local Plan Part 2 Detailed Policies (2014) describes the role of the Metropolitan Green Belt within Tandridge. It states that within the District, the Green Belt is seen as:

- Being a vitally important policy for controlling urban development and to maintain the openness around settlements;
- Preventing the outward spread of London;
- Preventing the coalescence of settlements;
- To assist in promoting urban regeneration, by encouraging the re-use of land; and
- Providing opportunities for access to the countryside and for outdoor recreation.

4.16 It is acknowledged within the existing Development Plan that parts of the Green Belt suffer from neglect and the challenge will be to improve the quality and usefulness of these areas. The Local Plan supporting text also seeks to make the best use of previously developed land, particularly surplus commercial sites, in order to protect the Green Belt (Issue 1 of the Core Strategy refers).

4.17 In line with national planning policy, Policy DP10 of the Local Plan Part 2 states that planning permission for inappropriate development in the Green Belt will only be permitted where very special circumstances exist, to the extent that other considerations outweigh any potential harm to the Green Belt, and any other harm.

4.18 Policy DP13 provides the planning policy context for new buildings within the Green Belt. It states that unless very special circumstances can clearly be demonstrated, the Council will regard the construction of new buildings within the Green Belt as being inappropriate.
development. However, subject to other Development Plan policies, the relevant exceptions to this are *inter alia*.

“The limited infilling or partial or complete redevelopment of previously developed sites in the Green Belt, but outside the Defined Villages, whether vacant or in use, where the proposal would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development.”

4.19 The explanatory text to the policy (para. 13.6) states that:

“The Council has identified and supports the contained development of two Strategic Employment Sites which are brownfield sites in the Green Belt, outside the Defined Villages. These are Hobbs Industrial Estate and Lambs Business Park, which comprise a range of commercial and industrial uses. Also within the District there are other brownfield sites outside the Defined Villages that make a significant contribution to the rural economy of the District. The retention and further development of these important employment sites will also be encouraged within the constraints of Green Belt policy”.

4.20 In addition to the above, Supplementary Planning Guidance was adopted by Tandridge Council in relation to Lambs Business Park, in November 2004. The purpose of the Guidance was to provide the framework against which proposals for the limited infilling, or complete or partial redevelopment of the site would be assessed.

4.21 The main proposals outlined within the SPD were to demolish the majority of buildings associated with the former brickworks use, to convert the former dryer building into employment floorspace, to replace an existing commercial unit with a smaller building and to use the former brick stacking areas as open storage facilities.

4.22 The proposals established in the Development Brief would result in:

- The demolition of approximately 2,500sq.m of floorspace;
- The net reduction in site coverage of around 2,150sq.m of space;
- Just under 1,525sq.m of refurbished floorspace; and
- An increase just over 4,400sq.m of lettable compound areas.

Local Planning Policy – Surrey County Council

4.23 As part of the proposed scheme relates to a renewable biofuel production plant, the Waste Development Plan for Surrey County Council is relevant. The latest iteration was adopted in May 2008 and was subsequently amended by order of the High Court in March 2009.

4.24 Policy CW5 (Location of Waste Facilities) outlines that proposals for waste facilities on unallocated sites will be considered in accordance with the following criteria:

- Priority will be given to industrial / employment sites, particularly those in urban areas, and to other suitable urban sites and then to sites close to urban area and to sites easily accessible by the strategic road network;
- Priority will be given to previously developed land, contaminated, derelict or disturbed land, redundant agricultural buildings and their curtilages, mineral workings and land in waste management use, over greenfield land;
• Areas of Outstanding Natural Beauty, Area of Great Landscape Value and sites with or close to international and national nature conservation designations should be avoided; and
• The larger the scale of development and traffic generation, the more important is a location well served by the strategic road network, or accessibly by alternative means of transport.

4.25 Policy CW6 provides the planning policy framework for waste related development in the Green Belt. It states that there will be a presumption against inappropriate waste related development in the Green Belt except in very special circumstances. Very special circumstances to justify inappropriate development of waste management facilities in the Green Belt will not exist unless the harm, by reason of inappropriateness and any other harm, is outweighed by other considerations. Very special circumstances may include:
• The lack of suitable non-Green Belt sites;
• The need to find locations well related to the source of waste arisings;
• The characteristics of the site; and
• The wider environmental and economic benefits of sustainable waste management, including the need for a range of sites.

4.26 Surrey County Council has begun preparation of its new Waste Local Plan. The Surrey Waste Local Plan 2019-2033 was submitted for independent examination on 12th April 2019. The Examination Hearing Sessions will commence in September 2019. On adoption, the policy context for developing waste facilities in the Green Belt, including on the subject site, could alter.

4.27 As demonstrated in the accompanying Exceptional Circumstances Report, there is a significant need for new waste processing facilities within Surrey. The north western element of Lambs Business Park (i.e. the former quarry area) has been shortlisted in the emerging Waste Plan to accommodate new waste facilities (Policy 10 refers).

Other Green Belt Evidence

4.28 As part of the evidence base supporting the emerging Local Plan, the Council has undertaken a review of how land falling within the existing Metropolitan Green Belt serves the five purposes of the Green Belt. The Assessment is being undertaken in four stages as follows:
• Establishing a Green Belt Assessment Methodology – the document, which was published in 2015, establishes the Council’s approach to understanding how and the extent to which, land within the Green Belt within Tandridge is serving the Green Belt purposes;
• Green Belt Assessment Part 1 (2015) – The report provided a historic assessment of the Green Belt within the District; a high-level assessment of the Metropolitan Green Belt; and a detailed parcel assessment that considered 47 parcels within the designation;
• Green Belt Assessment Part 2 (2016) – The report provided an assessment of 54 areas worthy of further investigation as defined by the Part 1 Assessment; and
• Green Belt Assessment Part 3 (2018) – The report identifies which sites within Tandridge demonstrate the exceptional circumstances that could justify the release from the Green Belt.

4.29 A summary of the key points contained within each evidence-based document, relevant to Lambs Business Park, is provided below:
4.30 **Green Belt Assessment Methodology (2015):** As well as establishing a methodology for the Assessment, the Council’s Green Belt Assessment Methodology provides further information on the purpose, function and impact of the Metropolitan Green Belt within Tandridge District. Section 2 of the Report states that:

- Tandridge District has the highest percentage of Green Belt in the Country (94%);
- Green Belt policy has been successful in enabling the District to fend off extensive development and retain its rural nature; and
- The main feature of the Metropolitan Green Belt is its permanence and its continued protection must be maintained as far as can be seen ahead.

4.31 **Green Belt Assessment Part 1 (2015):** In line with the Green Belt Assessment Methodology, the Part 1 Assessment divided the Green Belt within Tandridge District into parcels, using roads, railways and other physical features. Lambs Business Park was located within Parcel 031, which the Assessment found to be worthy of further investigation to understand whether it could be allocated in the Local Plan to help meet the District’s development needs. In relation to Parcel 031, Appendix D of the Part 1 Assessment concluded that:

> “Due to the parcel’s location far away from any settlement or urban area, it does not make any contribution to many of the Green Belt purposes associated with containing development from built up areas. However, the parcel is generally free from any significant concentration of development, and so is considered to play a strong role in safeguarding the countryside from encroachment. The industrial estate is recommended for further investigation due to the significant concentration of development present, and the encroachment on the countryside...”

4.32 Having undertaken the initial assessment, all the ‘areas for further investigation’ were assigned a new reference number. Lambs Business Park, which was identified as being Parcel 032. In respect of the Parcel, the Report concluded that:

> “The concentration of development at Lambs Business Park encroaches on the countryside, even though it was there prior to the Green Belt designation. As such, it has been identified as an area for further investigation” (page 24 refers).

4.33 **Green Belt Assessment Part 2 (2016):** In line with the conclusions of the Part 1 Assessment, Lambs Business Park was considered in more detail to understand whether it served purposes of a Green Belt.

The Council’s assessment concludes that by virtue of the scale of development on the subject site, its siting and existing uses, it is not considered to serve the Green Belt Purposes 1, 2 and 4. Specifically, the Assessment concludes that:

> “Overall, it is concluded that the Area does not serve the purposes of including land within the Green Belt, given its siting, the scale of development and existing employment use. Whilst the Area for Further Investigation is located within the countryside, the Business Park is a Strategic Employment Site with a quarry located on the western edge of the site outside the boundaries of the strategic employment designation, and as such is not considered to safeguard the countryside from encroachment. Its highly developed appearance compromises the open character of the Green Belt in this location. Although the site is self-contained and has limited visual impact, it is considered that it should be considered further as part of the Green Belt Assessment in terms of whether or not exceptional circumstances exist” (page 24 refers).
4.34 Green Belt Assessment Part 3: Given the conclusions presented within the Part 2 Assessment, Lambs Business Park was subject of a third assessment to consider whether the exceptional circumstances exist to justify the site’s removal from the Metropolitan Green Belt.

4.35 The Report concludes that there are the exceptional circumstances to justify the site’s removal from the Metropolitan Green Belt. Specifically, it states that:

“This site is one of only 3 large, well-performing industrial sites in the district with good access to the strategic road that, alongside Hobbs Industrial Estate and Westerham Road Industrial Estate, forms part of the main reservoir of industrial capacity in the district. In order to ensure that well-functioning sites are safeguarded and there is sufficient suitable land to meet future demand and support the local economy going forward, the evidence considers there is a need to protect the function of this site and enhance its attractiveness and competitiveness for industrial type activities through formal designation as a strategic employment location. Further, the evidence identifies significant capacity for expansion (7.44ha), which provides opportunity to increase overall employment land supply and stem industrial decline across the district. The hatched area on the plan above indicates an area for potential expansion/intensification. The spatial strategy for the district includes the intensification and expansion of existing sites and as such this site is strategy compliant. The site is considered, in principle, suitable for development from an ecology perspective subject to mitigation measures. It also has medium/high capacity for employment development within the landscape, subject to mitigation measures. Opportunity to utilise rail siding to minimise the vehicular movements to the site.

Further, in terms of the Green Belt it has been identified that this site does not serve any of the Green Belt purposes and as such the loss of the site would not result in Green Belt harm; however, it is acknowledged that its development could impact upon the wider Green Belt but that any impact could be reduced through sensitive design and landscaping. It would also be necessary to secure robust and defensible boundaries to ensure harm to the wider Green Belt is minimised and it is considered that the current boundaries would serve this purpose, albeit they may need to be reinforced. However, whilst South Godstone has been identified as having good accessibility, including access to public transport, it is considered that it would be primarily accessed via private car by employees.

In addition the site promoter is proposing a Green Technology Park and its proposed development represents a significant opportunity for higher-value, higher-density and higher-skills based employment provision, inward as well as spin-off investment, whilst increasing access to jobs for local residents. The intensification of this site in line with the recommendations of the evidence base would make a major contribution to meeting employment needs over the plan period and achieving the Council’s economic development aspirations. It also presents significant opportunities for wider community benefit, including the environmental benefit of the proposed biomass gasification plant. In addition it would also provide the opportunity to secure biodiversity enhancement opportunities. Opportunity to use former pit areas as flood alleviation and a nature reserve.

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

4.36 The conclusions presented within LRM Planning’s Exceptional Circumstances Report mirror the conclusions of the Council’s Green Belt Assessment Part 3; the exceptional circumstances exist to warrant the site’s removal from the Metropolitan Green Belt.

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2 Green Belt Assessment Part 3, Appendix 1 (2018)
5 Assessment of Purposes

5.1 The following section provides an assessment of the contribution that Lambs Business Park makes to the Metropolitan Green Belt within Tandridge District. The assessment, which is undertaken by LRM Planning, is conducted having regard to how the site effectively meets the fundamental aim of the Metropolitan Green Belt and the five purposes to which Green Belt designations should serve, as defined by national planning policy.

5.2 As indicated in the accompanying Exceptional Circumstances Report, the need for housing and employment land within Tandridge District and the need for new waste management facilities within Surrey, cannot be met without development on Green Belt land. This is demonstrated in the following paragraphs:

Housing

5.4 In 2015, the Council carried out an assessment of its local housing need. The findings of this assessment determined that Tandridge District Council had an objectively assessed need for housing (OAN) of 9,400 dwellings between 2013 and 2033. National policy, coupled with its guidance, makes it clear that the OAN is a ‘starting point’ for determining a housing requirement. It is only through the application of evidence and the consideration of constraints that requirement can be formed, and which may be justifiably different from the OAN. Having undertaken this assessment, the Council have concluded that the emerging housing requirement should be limited to 6,056 dwellings up to 2033.

5.5 Information presented in the 2017-18 Housing and Economic Land Availability Assessment (hereafter HELAA), as updated by the Interim 2019 HELAA, indicates that 12 non-Green Belt sites were found to be deliverable and developable, with a capacity for 349 dwellings. This is significantly short of the quantum of housing land required to meet either the housing requirement in the Local Plan, or the objectively assessed needs for housing. Even when including the additional sites found as part of the Urban Capacity Study are added, there would still be a significant shortfall in meeting the Council’s housing requirement and OAN.

Employment Land

5.6 Policy TLP01 states that the Council will seek to support the delivery of at least 15.3ha of B-class employment space.

5.7 Chapter 6 of the 2017 Economic Needs Assessment Update provides an assessment of existing and potential employment land within the District. These findings have been used by the Council to inform their latest HELAA. Table 4 of the 2017-18 HELAA, as updated by the 2019 HELAA, provides a list of the existing and potential sites reviewed within the Economic Needs Assessment. Of the 36 sites assessed, only 3 sites, which together would provide 3.48ha of employment land provision, were not located within the Green Belt.

5.8 Accordingly, without developing on Green Belt sites, the employment land requirement as outlined within the emerging Local Plan could not be met.

Waste

5.9 As outlined within the emerging Waste Plan, *unless some Green Belt land is allocated there will
There is no certainty that sufficient land can be developed to meet the identified need for additional waste management capacity (para. 4.3.2.3 refers). Consequently, there is an identifiable need to identify sites suitable for accommodating waste uses within the Metropolitan Green Belt within Surrey.

Implications

5.10 The evidence presented above suggests that if the development needs are to be met within the District, there will be a clear necessity to amend Green Belt boundaries.

5.11 As outlined above, national planning policy recognises the need, in certain circumstances (exceptional circumstance), to review Green Belt boundaries in order to identify adequate land to accommodate development needs, which can contribute to securing the most sustainable patterns of development.

5.12 The assessment below demonstrates the limited contribution that Lambs Business Park makes to the Metropolitan Green Belt and the five purposes of designating Green Belt land. This work forms part of the wider exceptional circumstances case for removing the site from the Green Belt. The full case is provided in the accompanying Exceptional Circumstances report, as well as the Council’s evidence base.

Main Purpose

5.13 The main purpose of the Metropolitan Green Belt is to prevent urban sprawl by keeping land permanently open within the countryside surrounding the metropolitan area of greater London. As such the most sensitive areas of the Green Belt surrounding Lambs Business Park are to the north, towards London. Additional development to the west of Lambs Business Park and in the former quarry area would not affect the open nature of the countryside between the subject site and Greater London.

5.14 Proposals for the redevelopment of Lambs Business Park will be subject to a comprehensive technical assessment. The initial findings of the work have been summarised in the accompanying Development Framework Document. The technical work has already been used to underpin a masterplan which has been prepared to ensure its compactness within the site’s physical boundaries. Therefore, a distinction can be drawn between a compact and contained development that responds to the site’s previous and existing uses, as well as its environmental constraints and opportunities, and the urban sprawl Green Belt policy seeks to prevent.

Purpose 1 – To Check the Unrestricted Sprawl of Large Built-Up Areas

5.15 Whilst Lambs Business Park itself cannot be considered to be a large built-up area, the boundaries of the site are clearly defined by both existing built development, industrial and manufacturing processes and natural features (woodland and water features). Land uses within the site also pre-date the original Green Belt designation. The subject site therefore currently makes no contribution to this purpose.

5.16 As demonstrated within the accompanying Development Framework Document, the proposals have been carefully masterplanned so that they don’t extend beyond the natural boundaries formed by the significant woodland to the west and south, the water feature in the south west portion of the site and the physical extent of the Industrial Estate to the east. The northern
boundary is clearly defined by the Tonbridge to Reading railway line.

5.17 Whilst the proposed extension of the site to the west would lead to modest encroachment into the countryside, it would not constitute the unrestricted sprawl of large-built up areas. Therefore, this purpose is of little relevance.

**Purpose 2 – To Prevent Neighbouring Towns Merging Into One Another**

5.18 Purpose 2 is a particular consideration to potential directions of growth for established urban areas. The nearest towns and villages to the subject site are set out below:

- **East** – The Green Belt to the east prevents coalescence between the site and South Godstone and Crowhurst Lane End. South Godstone is the closest settlement to the site, located just over 1km to the east.

- **South East** – The Green Belt to the south east prevents coalescence between the site and Blindley Heath. Blindley Heath is approximately 2.5km to the south east of the site. The boundary of the site is also clearly defined by significant tree and hedgerow planting, which links to Birchen Coppice.

- **South** – The Green Belt to the south prevents coalescence between the site and Horne. Horne is over 4km to the south of the site. The boundary of the site is also clearly defined by significant tree and hedgerow planting, which links to Birchen Coppice.

- **South West** – The Green Belt to the south west prevents coalescence between the site and Outwood. Outwood is over 4km to the south west of the site. The boundary of the site is also clearly defined by significant tree and hedgerow planting, which links to Birchen Coppice.

- **West** – The Green Belt to the west prevents coalescence between the site and South Nutfield and Redhill. South Nutfield is the closest settlement to the west and is over 4 kilometres from Lambs Business Park. The boundary of the site is also clearly defined by Maple Wood. The M23 also provides a physical barrier between the site and South Nutfield.

- **North West** – The Green Belt to the north west prevents coalescence between the site and Bletchingley and Nutfield. The boundary of the site is also clearly defined by Maple Wood and the railway line. The M23 also provides a physical barrier that would prevent the site merging with Nutfield. Bletchingley is approximately 3km to the north west.

- **North** – The Green Belt to the north prevents coalescence between the site and Godstone. The Tonbridge to Reading railway line provides a physical barrier which would prevent the site merging with Godstone. Godstone is over 3km to the north of the site.

- **North East** – The Green Belt to the east prevents coalescence between the site and Tandridge. Tandridge is over 3.5km to the north east of the site. The Tonbridge to Reading railway line also provides a physical barrier which would prevent the site merging with Godstone.

5.19 The distance between the site and all of the surrounding settlements is significant. As the footprint of the site is only proposed to be expanded to the west, theoretically, that is the only direction of growth where coalescence is a potential concern. However, as the nearest settlement to the west of the site is over 4km away, it is not considered that the expansion of the site would cause the merging of built-up areas.
Purpose 3 – To Assist in Safeguarding the Countryside from Encroachment

5.20 The existing Business Park, its associated infrastructure and the railway line to the north, provide a significant amount of built development within the Green Belt. This built development on the eastern area of the subject site predates the first Green Belt designation in Tandridge District. Whilst the boundary of the Business Park has not altered in any way since the designation was originally made, the planning status afforded to the site as a Strategic Employment Site within the Green Belt has provided the opportunity for the area to adapt, albeit in a limited and constrained manner.

5.21 It is acknowledged that development of the western area of the site (the former Quarry) could constitute encroachment into the countryside. As an undeveloped area, Green Belt policy has therefore operated successfully, but it now needs to be viewed against the development pressures faced by the District.

5.22 As indicated above, to meet the full objectively assessed needs for development land within the District, it will be necessary to develop on land that is currently located within the Metropolitan Green Belt (para. 14.3 of the draft Local Plan refers). The modest westward extension of the Business Park can be accommodated in a manner that will secure a defensible boundary in the form of:

- To the north: The Tonbridge and Reading Railway Line;
- To the east: The boundary of the existing Business Park;
- To the west: Significant woodland – Maple Wood; and
- To the south: Significant woodland – Birchen Coppice.

5.23 In addition to the above, the landscape assessment prepared by Arup concludes that given the screening provided by the existing topography and vegetation within and surrounding the site, it can comfortably accommodate new development of between 20 and 30m in height above existing site levels, which, on the whole, is greater than being proposed. These natural features provide considerable screening that means that there is only one visual receptor for which the proposed development provides a moderate significant impact, and this will only affect passengers on the Tonbridge to Reading Railway Line.

5.24 It is also noted that the western area of the site currently has a planning status for clay extraction, inert waste recovery operations and as a depot to handle and process re-saleable railway ballast. It is acknowledged that technically the site cannot be considered as being previously development land (Annex 2 of the NPPF refers). However, in the context of the demonstrable need for land within the Green Belt to be used to meet development requirements, the characteristics of the existing and previous uses associated with the western area of the site and the length of time a full restoration could take to complete (2047), will make the site a more attractive proposition to develop than other undeveloped areas of the countryside. Arup’s Landscape Assessment even demonstrates that the proposed development could improve access to recreational opportunities, as well as the site’s visual amenity. These improvements would be delivered as part of a comprehensive landscape and restoration strategy for the western area of the site.

5.25 Given the above, the site currently makes little contribution to this purpose. The extension of the site in a westward direction would lead to encroachment, but this is likely to be preferable to...
developing in other areas of the undeveloped countryside in Tandridge District. The accompanying Development Framework Document and the Technical Evidence Document indicates that the proposed development can be accommodated on the site with little harm. In landscape and ecological terms, the development even provides the potential for betterment.

**Purpose 4 – To Preserve the Setting and Special Character of Historic Towns**

5.26 The Heritage Assessment of the subject site has demonstrated that there is one conservation Area within 1km of the site; the South Park Conservation Area. It is located approximately 340m to the north west. The Heritage Assessment concludes that the proposed development will have no impact on the Conservation Area, or its setting. Accordingly, the existing Business Park, nor the extension proposed by the accompanying Development Framework Document, would adversely affect the character of the setting or the character of the Conservation Area.

**Purpose 5 – To Assist in Urban Regeneration by Encouraging the Recycling of Derelict or Other Land**

5.27 Whilst the wider designation of the Green Belt within Tandridge District has undoubtedly assisted in promoting the re-use of previously developed land, it has, in the case of the subject site, prevented it from achieving its full development potential.

5.28 As seen from the preceding local planning policy section, the Development Brief for the eastern portion of the subject site was prepared to support its infilling, partial or complete redevelopment. The policy context sought to reduce the quantum of development on the subject site without an assessment of what form and type of development could be accommodated on the site without significantly harming the purposes of the Green Belt. The policy context therefore significantly underplayed the contribution the site could make to meeting the need and demand for commercial space within the District. The Green Belt designation and the related policy context has therefore had a detrimental impact on the role that the site could play in achieving the Green Belt purpose of recycling derelict land. Indeed, from 2018 the vast majority of the existing buildings proposed to be demolished, will in any event be unlettable as a result of their EPC rating (below G). In addition, from 2023, regardless of the period of time remaining on a lease, WT Lamb will not be able to lease the buildings to an existing occupier. Commercial advice provided to WT Lamb has indicated that it would not be economically viable to refurbish these units to improve their EPC rating. Consequently by 2023 at the very latest, the buildings will be vacant and redundant. Their redevelopment will therefore be essential to ensure that Lambs Business Park continues to make a full economic contribution to the functioning economic area.

5.29 Whilst the western land parcel falls outside the existing Strategic Employment Site designation and technically cannot be considered as being previously development land (Annex 2 of the NPPF refers), the historic and current uses on the site, which include its current planning status for clay extraction, inert waste recovery operations and as a depot to handle and process re-saleable railway ballast, means that it offers limited value as an area of the countryside. Given the historic use of the western portion of the site, its well-screened nature, the significant time it could take to restore the site, its strong defensible boundaries and the need to amend the Green Belt within the District to accommodate the need for housing and commercial land, it offers an opportunity the existing quarry area offer an opportunity for it to be recycled. Its development would undoubtedly reduce the need to develop on genuinely undeveloped land.
6 Conclusion

6.1 Information contained within the emerging Tandridge District Local Plan and its accompanying evidence base suggests that in order to meet the identified development needs in full, amendments to the Green Belt boundary within the District will be required. Moreover, in order to meet the need for new waste management facilities within Surrey, development on Green Belt Sites will also be required.

6.2 The sites identified within the existing Green Belt to help meet these development pressures, including Lambs Business Park have been selected for a range of reasons, including the contribution each site makes to the purposes of the Metropolitan Green Belt and whether the exceptional circumstances exist to justify the site’s release from the Metropolitan Green Belt.

6.3 An Assessment of the contribution areas within Tandridge District make to the Metropolitan Green Belt has been provided by the Council (Green Belt Assessments Part 1 and 2). In addition, the Part 3 Assessment seeks to understand whether the exceptional circumstances exist to justify each site’s removal from the Green Belt.

6.4 This assessment, which has been prepared by LRM Planning, seeks to supplement that Council’s Part 1 and 2 work. In addition, the separate Exceptional Circumstances Report seeks to supplement the Council’s Part 3 Assessment.

6.5 This Report concludes that whilst Lambs Business Park and the adjacent quarry is partly allocated as a Strategic Employment Site that falls entirely within the Metropolitan Green Belt, the analysis confirms that development in this location would not compromise any of the national planning policy Green Belt purposes. In particular:

- The Lambs Business Park constitutes existing built development. Proposals to redevelop the Park, which include an extension to the west, would not undermine the primary purpose of the Metropolitan Green Belt, which is to keep land permanently open in the areas surrounding London. The proposed development would not reduce the area of open country between the subject site and the metropolitan area of London;
- The subject site cannot be considered as being a large built-up area. Nonetheless, boundaries of the subject site are well defined by built development and natural features. Within the envelope created by these constraints, development of up to 30m in height can be accommodated with little visual harm. The strong existing boundaries would ensure that any development could not be considered as being unrestricted sprawl;
- The expansion of the subject site will not cause towns to merge. The distance between the subject site and the surrounding settlements is significant and therefore a modest reduction in the gap would not lead to coalescence;
- The site is divided into two-character areas, which include built development associated with the existing Business Park and the existing quarry. Clearly given the quantum of development within the existing Business Park, the eastern portion of the site cannot be contributing to the purpose of keeping the countryside from encroachment. It is acknowledged that extending the Business Park to the west would technically constitute encroachment into the countryside, albeit very modestly. However, an amendment to the Green Belt will provide an opportunity for development to come forward on a site which has land uses currently associated within it and which may not be restored until 2047, has a strong defensible boundary and can visually accommodate development. The development proposals could even improve access to recreational areas within the countryside, as well as the site’s visual amenity;
- The proposed development would not impact on the setting or the special character of any historic towns; and
- The Green Belt designation on the site has prevented it from achieving or being used to its full potential. Whilst development in the western portion of the site would not constitute development on previously developed land, for the reasons set out above, it must be considered as being preferable than a site that has had no previous use associated with it.

6.6 In light of these conclusions, the proposed development is preferable to new development taking place at another site, in a more sensitive area of the Green Belt. As a result of the technical work prepared to date, a distinction can be drawn between the proposed development, which can be developed with little environmental harm and the urban sprawl Green Belt policy is designed to prevent.

LRM Planning
August 2019
Appendix 1 – Site Location Plan
Appendix 2
LAND AT LAMBS BUSINESS PARK, SOUTH GODSTONE

Exceptional Circumstances Case

Prepared by LRM Planning Limited on behalf of WT Lamb
Report Control

Project: Lambs Business Park

Client: WT Lamb

Job Number: 13.106

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1 Introduction

1.1 This report has been prepared on behalf of WT Lamb, in support of their proposals to regenerate, intensify and enlarge Lambs Business Park, South Godstone, for a range of employment and ancillary uses.

1.2 WT Lamb have been operating at the site for over 100 years, having purchased the site in 1918 in order to manufacture roof tiles and high-quality bricks. The works used the privately-owned rail siding to import coal and to export bricks and tiles manufactured on the site. Given the nature of these uses, the site has been heavily used for industrial and manufacturing processes, with the railway being a key element of the site’s success.

1.3 More recently however, the demand for traditionally manufactured building products has lessened and the uses of the buildings on the site have altered. The eastern area of the site has been redeveloped as an industrial estate, whilst the western area is used for aggregate recycling and inert waste recovery activities.

1.4 It is now WT Lamb’s aspiration to develop a modern and high-quality technology park on the site. Their development aspirations seek the site’s redevelopment to provide two data centres, a decentralised combined cycle energy centre (combined heat and power), incorporating a renewable biofuel production plant and the intensification of the existing site to accommodate associated higher value, more productive employment uses.

1.5 Over the past 4 years, WT Lamb have been working with Tandridge District Council and Surrey County Council to form a future strategy for the redevelopment of Lambs Business Park, which has culminated in Policy SES03 of the Submission Local Plan and the site’s identification in Policy 11a of the Submission Surrey County Council Waste Plan as a strategic waste site.

1.6 The work provided by WT Lamb as part of this collaborative process has focused on the need for a long-term Development Plan response for the site, which includes its removal from the Metropolitan Green Belt. Such a response will ensure that the Business Park will have a more complete role in meeting the Local Authority’s requirements for high value and more productive commercial uses. Without such a policy response, the extent to which the Business Park could provide these benefits is restricted.

1.7 As set out within national planning policy, the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open. The essential characteristics of Green Belts are their openness and their permanence. However, national planning policy does permit, where exceptional circumstances exist, for Green Belt boundaries to be altered through the preparation or a review of a Local Plan. In the case of Tandridge District Council, the preparation of its new Local Plan provides an opportunity to review the existing boundaries of the Metropolitan Green Belt, as defined within the local authority area.

1.8 The purposes of this report is to assess whether the exceptional circumstances exist to remove Lambs Business Park from the Metropolitan Green Belt. The work has been undertaken using a methodology which focuses on:

- How the proposed development accords with national planning policy;
- The need and demand for the proposed development;
- The benefits of co-locating the proposed uses on the same site; and
- The specific characteristics of the site that provide a unique opportunity to develop the uses proposed.

1.9 In order to demonstrate that the site provides a unique opportunity within the sub-region to accommodate the proposed development, an assessment of sites considered suitable to accommodate waste facilities by both Surrey and West Sussex Waste Planning Authorities is provided, against a set of industry standard site requirements.

1.10 Together, the conclusions presented for each section of the report comprise the exceptional circumstances to justify the site's removal from the Metropolitan Green Belt.

1.11 This report should be seen as being an iterative document and will be updated as and when new information and evidence is published. It is the third iteration of this Report, following earlier versions in 2016 and 2018.
2 Site Description

2.1 The site, which is identified at Appendix 1, comprises a parcel of land located approximately 1km to the west of South Godstone. It comprises a 13.4ha site and is located wholly within the Metropolitan Green Belt. It is divided into two distinct parcels as follows:

- The eastern land parcel is identified as being a Strategic Employment Site within the current Development Plan for Tandridge District. There is a distinct difference in the age and quality of the commercial units within the Business Park. Whilst units to the east and south are modern and satisfy the commercial demand for such space, units to the north and west are mainly buildings associated with the former brickworks. These units do not satisfy EPC standards, having a current rating of G (please refer to Appendix 2 for further information). The eastern parcel of land measures approximately 5.4ha; and
- The western land parcel, which lies outside the Strategic Employment Site designation, was historically used as a quarry with permission for clay extraction, inert landfill and the importation of aggregates via the rail siding. According to the planning permissions, WT Lamb have until 2047 to restore the quarry. This part of the wider site measures some 8ha. Its current use for aggregate recycling and inert waste recovery use means that it currently does not make contribution to the purposes of the Metropolitan Green Belt.

2.2 A 300m live railway siding located to the north of the quarry area is owned by WT Lamb. Evidence provided by Network Rail in Appendix 3 of this report confirms that the main line rail connection is maintained in order to support rail movements to and from the privately-owned railway siding and that subject to WT Lamb’s siding being restored and maintained to an agreeable specification, the siding can be used to accommodate rail movements. In addition to this, the main railway track operated by Network Rail has a further siding of 300m in length, which is connected to WT Lamb’s privately-owned siding.

2.3 The site significantly slopes from the northwest towards the south and is bounded by:

- The Reading to Tonbridge Railway Line (including the Channel Tunnel Freight Line) to the north;
- Countryside, which is largely used for agriculture, to the south (although permission exists for the extraction of oil and gas – see Surrey County Council permission 2015/0170);
- Maple Wood and countryside, which is largely used for agricultural purposes, to the west; and
- Fields parcels and residential premises located on Terracotta Road (all of which are in the ownership of WT Lamb) and Ruston Avenue to the east.

2.4 The subject site is well screened by substantial boundary hedges to the west and south, which support a significant number of trees (please refer to the landscape section of the accompanying Development Framework Document). The boundaries to the north and northwest are formed and screened by Maple Wood and a heavily wooded railway embankment. As indicated above, the remaining land in the surrounding environs is open countryside and within agricultural use. Agricultural field boundaries therefore screen views into and out of the site.

2.5 An Area of Great Landscape Value is located to the north of the site, whilst a Site of Nature Conservation is located to the north and west (Maple Wood), Birchen Coppice to the south is a Potential Site of Nature Conservation Importance. Areas of high archaeological potential are located to the south west. These designations are located outside Lambs Business Park.
3 Previous, Existing and Proposed Uses

Previous Uses

3.1 WT Lamb have controlled the site for over 100 years, having originally purchased the brickworks operations in 1918 to produce traditional roof tiles and bricks made from the local Weald clay, quarried in the site’s western land parcel. The works utilised its privately-owned railway siding to import coal and export bricks and tiles. Given the nature of the quarrying use, the site has been intensively used for industrial manufacturing purposes and the railway has had a strong association with these former land uses.

3.2 Over more recent years, the demand for traditional tiles and bricks has lessened and the original brickworks buildings, which are located within the eastern area of the site, have been reused for commercial purposes.

Existing Uses

3.3 The site benefits from several existing uses and extant planning permissions, which allow for continued operations.

3.4 The eastern land parcel, which is wholly located within the Metropolitan Green Belt, is identified as being a Strategic Employment Site within the Adopted Tandridge District Development Plan. As indicated within the previous section, there is a distinct difference in the age and quality of the commercial units within the Business Park, with the units to the east and south being more modern and having successfully met commercial demand for such space.

3.5 Units to the north and west of the Business Park are largely buildings associated with the former brickworks. The vast majority of these buildings do not have an EPC rating above G and therefore WT Lamb can no longer grant a new tenancy (including a renewal tenancy). In addition, WT Lamb will not be able to continue to let any of these buildings from 1 April 2023. Whilst in theory it is possible that these buildings could be refurbished to improve their EPC rating, commercial property advice provided to WT Lamb has confirmed that this will be unviable (see Appendix 2). In any event, even with a refurbishment programme, only one of the buildings is capable of meeting the required level. Consequently, by 2023 at the latest, these buildings will be vacant and redundant and will need to be redeveloped.

3.6 The site also benefits from various extant planning permissions for:

- Manufacturing facing bricks and to thermally treat clay products; and
- Development of an additional 1,920 sq.m of B1, B2 and B8 uses.

3.7 The western land parcel lies outside the Strategic Employment Site designation. It was historically used as a quarry for manufacturing bricks and tiles and benefits from the following current planning permissions:

- TA80/675 – The construction of a depot for handling resalable spent railway ballast and earth; repossessing; and the infill of the void; and
- TA99/155 – The extraction of clay for the manufacture of bricks until 2040 and the infill of the existing void utilising Class A inert waste by 2047.
3.8 The 1999 planning application included the site subject of the 1980 planning application in its restoration provisions, under the terms of a Section 106 legal agreement. This established the deadline for the restoration of the site as 2047.

3.9 Phase 1 was previously restored with the approval of the Environment Agency. An Environment Agency (hereafter EA) Waste Recovery Permit (WRP) has been granted to restore Phases 2 and this restoration is near completion. Phase 4 now benefits from a Waste Recovery Permit (WRP) and the restoration of this area will commence shortly following the successful recovery of silts and aggregates from the area, permitted under EA licence EPR/EB3107CQA001. A WRP for Phase 3 will follow the successful restoration of Phase 4. This will ensure that all areas are professionally restored with inert material in due course.

3.10 Both the extant planning permissions, as well as the EA WRP, confirm the western portion of the site's current use, as an aggregates recycling and inert waste recovery facility.

Proposed Uses

3.11 A number of options for the future of the site have been previously considered by WT Lamb. Based on the significant amount of technical and feasibility work, the favoured option is:

- A c.5,418 sq.m combined cycle energy centre (up to 49 MWe), incorporating a renewable biofuel production plant;
- 2 no. 9,245 sq.m data centres (over 2-3 storeys), with associated supplementary energy centres (decentralised CCGT);
- The intensification and redevelopment of underutilised areas of the Business Park to provide higher-value and more productive employment space;
- The use of the former pit areas for flood alleviation and as a nature reserve; and
- Education and learning opportunities to be explored.

3.12 The combined cycle energy centre, the two data centres and the renewable fuel biofuel plant are proposed on c.5.8 ha of the site.

3.13 As indicated in the accompanying Development Framework Document, WT Lamb seek the delivery of an exemplar, market leading, sustainable technology park.

Data Centres

3.14 The data centres will house computer systems and associated infrastructure. Typically, a data centre will house a large group of networked servers for the remote storage, processing and distribution of personal and corporate electronic data. The data centres will be used to house air handling units required to cool the facility, ICT equipment, ancillary batteries, electrical switch gear, chilled water supplies and generators. Given the nature of the use, data centres are large consumers of power.

The Combined Cycle Energy Centre

3.15 The CCGT Energy Centre will be designed as a highly-efficient and decentralised combined heat and power plant. It will be powered by either a conventional gas connection, or a combination of gas from a conventional connection and from the consented gas field to the south of Lambs Business Park.
3.16 Using a gas and a steam turbine, the energy centre will produce 49MWe and residual heat. The production of this quantity of electricity will ensure that the power needs of the data centres and the renewable biofuel production plant are met in full, from a decentralised source, without the need for electricity to be provided from the National Grid. Any residual electricity will be used within the Business Park or sold to the National Grid.

3.17 Residual heat (up to 43MWth) produced from the combined cycle energy centre could be used in a number of different ways, including:

- In the renewable biofuel production plant. The residual heat will dry refuse derived fuel wastes (hereafter RDF), via either a water or an air heat exchanger; and / or
- Heat and cool the proposed data centres; and / or
- To heat and cool existing and planned developments in the surrounding area.

Renewable Biofuel Production Plant

3.18 The renewable biofuel production plant will utilise pre-prepared and pre-bundled RDF waste imported to the site by rail by a third-party waste operator. WT Lamb are in discussions with a number of third-party waste operators, including the Day Group, who own several rail heads in the South East, with their nearest usable railheads being located within Woking and Salfords. The third-party operator will obtain pre-prepared and pre-bundled RDF waste material to be supplied to their rail sidings for the onward transportation to WT Lamb’s rail siding at Lambs Business Park.

3.19 The renewable fuel production plant will process 150,000 tonnes of waste per year. This will comprise pre-processed commercial and residual wastes.

3.20 The waste handled by the Plant will be the residual product that is left after processing waste materials via traditional sorting methods to extract elements that can be usefully recycled (for example metals, suitable grades of plastics and glass). These useful materials are sent onwards to appropriate recycling facilities.

3.21 Ordinarily, the waste to be handled by the renewable biofuel production plant is unrecyclable and would be sent either to waste recovery facilities or to landfill. Instead, this process will see the waste being recycled to create a biofuel. The pelleted bio-fuel will be distributed via the railway network to an end user, who will combust or gasify the product within existing permissions to create renewable heat and power. Typical customers for the fuel will be the domestic and European cement, steel and coal fired power sectors.

3.22 The plant will contain a number of processing operations to upgrade the waste to a finished fuel product. All the waste material will be supplied by a contract to an agreed specification and be processed to form a final fuel product that can be used as an alternative to conventional solid fuels, including coal.

3.23 The production process shall include the following key stages:

- Initial acceptance and Quality Control;
- Shredding and separation;
- Screening and the removal of any conventional recyclable materials;
- Screening and the removal of contaminants;
- Drying, including the use of 6-10MWth of residual heat from the combined cycle energy centre;
- Milling and pelletising;
- Quality control and testing; and
- Onward transportation to end users by rail.

3.24 Any residual waste that is not suitable to be used in the biofuel product will, where possible, be transported off-site for recovery.

3.25 The reprocessing of waste within the renewable biofuel production plant constitutes a recycling operation and no waste will be combusted or gassified within Lambs Business Park. The waste will be handled at the highest possible point on the Waste Hierarchy.

Redevelopment of the Remainder of the Business Park

3.26 As shown on the accompanying masterplan (see Appendix 4), there are a number of underutilised and undeveloped areas of the Business Park that are capable of being redeveloped to provide higher value and more productive employment land and premises. These areas total some 3.03ha. These areas are in addition to the c.5.8ha on which the two data centres, the combined cycle energy centre and the renewable biofuel production plant will be located.

3.27 The remaining 4.57ha of the existing industrial estate provide uses which better satisfy up-to-date expressions of demand for employment land and premises. They are also more modern buildings which comply with EPC standards. However, WT Lamb will consider opportunities to redevelop these areas to better align them with the concept of the ‘green technology park’, as and when they arise. The primary focus however, will remain the redevelopment of the opportunities identified in the preceding paragraph in the first instance.

3.28 It remains WT Lambs ambition to develop these areas for uses which will complement the development proposals identified in the accompanying Development Framework Document.

3.29 Land in the south west corner of the site is proposed to accommodate the surface water drainage strategy and landscape and ecological enhancements. These features of the proposed development are essential to facilitate the wider redevelopment proposals. Depending on the outcome of the masterplan exercise, it could also form an additional intensification area.

Conclusions

3.30 The benefits of the entirely privately funded development are summarised within this report. These benefits, taken as a whole, present a sub-regionally unique set of circumstances, that as evidenced by this report and the accompanying information, warrant the site’s removal from the Metropolitan Green Belt.
4 Planning Policy Context

4.1 As the Tandridge Local Plan was submitted on 18th January 2019, in line with para. 214 of the 2019 version, the policies within the 2012 National Planning Policy Framework (hereafter NPPF) will apply for the purpose of Examining the Plan. As such, the following Section provides a summary of the relevant policies outlined in the 2012 version of the NPPF and an assessment of how the scheme accords with them. Summarily, it describes how the proposed development accords with national planning policy, in relation to:

- Sustainable Development;
- Economic Development;
- Meeting the Challenge of Climate Change;
- Waste; and
- The National Planning Policy Framework's Core Planning Principles.

Sustainable Development

4.2 Para. 6 of the NPPF confirms that the purpose of the planning system is to contribute to the achievement of sustainable development. It outlines that the policies contained within it, taken as a whole, constitute the Government’s view on what sustainable development means in practice for the planning system.

4.3 National planning policy confirms that there are three dimensions to sustainable development: economic, social and environmental. The planning system therefore has several roles to perform, including:

- An economic role – contributing to building a strong and responsive economy that ensures that there is sufficient land available at the right times to support growth and innovation;
- A social role – supporting strong, vibrant and healthy communities; and
- An environmental role – contributing to protecting and enhancing the natural, built and historic environment. Specifically, the planning system should ensure that natural resources are used prudently, waste and pollution is minimised and that the Country moves towards a low carbon economy.

4.4 Para. 8 confirms that these roles should not be undertaken in isolation, because they are mutually dependent. Pursing sustainable development seeks positive improvements to the natural, built and historic environment, as well as people’s lives, through *inter alia*:

- Making it easier for jobs to be created in cities, towns and villages;
- Achieving net gains for nature; and
- Replacing poor design with better design (para. 9 refers).

4.5 The NPPF confirms that the presumption in favour of sustainable development is the golden thread running through both plan-making and decision-taking. For plan-making, this means local planning authorities should:

- Seek positive opportunities to meet the needs of their area; and
- Meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless:
- Any adverse impacts would significantly and demonstrably outweigh the benefits when assessed against the policies in the Framework taken as a whole; or
- Specific policies in the Framework indicate that development would be restricted.

4.6 For Lambs Business Park, the only specific policies in the Framework that would suggest that development should be restricted is the site’s location within the Metropolitan Green Belt. However, the Framework also establishes the circumstances where the boundaries of the Green Belt can be amended. For the reasons provided in this report, there are exceptional circumstances that warrant the site's removal from the designation.

4.7 Moreover, the benefits provided by the proposals (as indicated below) significantly and demonstrably outweigh any harm when assessed against policies contained within the NPPF. Therefore, the scheme should benefit from the presumption in favour of sustainable development.

**Economic Development**

4.8 The NPPF confirms that the Government is committed to securing economic growth in order to create jobs and prosperity and to meet the twin challenges of global competition and a low carbon future (para. 18 refers).

4.9 The planning system should do everything it can to support sustainable economic growth and not act as an impediment to it. Significant weight should therefore be placed on the need to support economic growth through the planning system (para. 19 refers).

4.10 When preparing Local Plans, para. 21 states that Local Planning Authorities should, amongst other things:

- Establish a clear economic vision and strategy for the area which positively encourages sustainable economic growth;
- Identify strategic sites to meet anticipated needs over the plan period;
- Support existing sectors and where possible, identify and plan for new and emerging sectors likely to locate in the area;
- Plan positively for the location of clusters or networks of knowledge driven, creative or high technologies;
- Identify areas for economic regeneration, infrastructure provision and environmental enhancement; and
- Facilitate flexible working practices.

4.11 Planning policies should also avoid the long-term protection of sites allocated for employment use where there is no reasonable prospect of a site being used. In such a circumstance, development proposals for alternative uses should be treated on their merits, having regard to market signals and need (para. 22 refers).

4.12 The development proposals accord with the national planning policy in relation to economic development. Specifically, the proposals:

- Have been formed to provide a strategic scale of development that has been planned in a comprehensive manner, which responds to the economic strategies for the local authority
area, the sub and wider region (please refer to the accompanying 'Economic Case and Economic Impact' for development at Lambs Business Park, by Hardisty Jones Associates;

- Assist in meeting the identified employment needs in Tandridge over the Plan period;
- Are likely to attract higher value and more productive uses in a technology cluster in the longer-term. There are additional opportunities to accommodate such uses in underutilised and undeveloped areas of the Park;
- Seek to regenerate an important employment site within Tandridge District. The scheme seeks to replace dated buildings originally built as part of the original brickworks. These premises will, from 2023 be vacant and redundant as they will not satisfy Energy Performance Certificate Standards. In accordance with the NPPF (para. 22 refers), these areas of the site should be released for alternative uses / redevelopment. Development in the quarry area will ensure that the site is restored earlier than the relevant planning permissions require and could lead to ecological and landscape enhancements;
- Whilst none of the proposed uses can be considered as falling within the high technology sector, they are key elements of infrastructure that are required to support such uses. In particular, the data centres not only provide significant data storage facilities within the U.K., but there are other indirect benefits associated with them, including significantly improved fibre optic infrastructure in the local area, which will mean there is more capacity to handle larger quantities of data;
- The development of the data centres will increase the capacity of cloud-based data storage facilities. Cloud based systems provide the opportunity for businesses to share I.T. resources (including data, applications, networks and servers) to computers and other devices on demand. They provide a number of benefits for businesses over ‘hard’ I.T. infrastructure, including facilitating flexible working practices; including being able to work from any location, which could generate more sustainable travel patterns;
- Whilst there are a number of data centres in the sub-region, there aren’t any within Tandridge District; it is a new and emerging sector within the local authority area. There is a growing demand for data centres due to the increase demand for cloud storage systems and the need for information contained within data centres to be stored in the country of origin for security, disaster recovery and latency reasons (the delay in requesting data to receiving it). Similarly, there are no renewable biofuel production plants or combined cycle energy centres within either the Local Authority, or the County;
- The highly efficient combined cycle energy centre will create 49MW of decentralised electricity. This electricity will be used to power businesses, essential infrastructure (including the data centres and the proposed waste management facility) and homes within the local area, all of which will have a positive impact on the local economy; and
- Decentralised energy production will reduce the demand for electricity from the National Grid, which will enable that supply to support other schemes elsewhere;
- The use of the residual heat from the combined cycle energy centre will be used to create biofuel. That biofuel will be used to create heat and power off-site.

Meeting the Challenge of Climate Change

4.13 The NPPF outlines that planning should play a key role in securing radical reductions in greenhouse gas emissions and support the delivery of renewable and low carbon energy and associated infrastructure (para. 93 refers).

4.14 To achieve this objective, para. 95 states that local planning authorities should, *inter alia*, plan for new development in a manner which reduces greenhouse gas emissions. Given the significant demand for data centres in the wider London market, including within Surrey and Tandridge (please refer to Section 5 of this Report), it is right and proper that the emerging Tandridge Local...
Plan responds and provides an adequate supply of suitable sites for data centres. However, as high consumers of power, there are genuine planning reasons to seek solutions to ensure that their electrical consumption is provided in the most efficient manner. Their co-location with a highly-efficient, low-carbon decentralised energy centre, ensures that a reliable electrical supply can be fed to the data centres.

4.15 In turn, the heat from the energy centre will be used to dry RDF waste that would ordinarily be sent to either waste recovery facilities or landfill. The renewable biofuel production plant will recycle this RDF waste and convert it to a product that will be exported off-site to be combusted or gasified to create additional electricity and heat.

4.16 Para. 97 of the NPPF states that local planning authorities should have a positive strategy to maximize renewable and low carbon energy (including the allocation of sites for low carbon and renewable energy infrastructure) and consider identifying suitable sites to accommodate and to identify opportunities where development can draw its energy supply from decentralized, renewable or local carbon energy supplies and co-locate potential heat customers and suppliers.

4.17 The proposed development responds to para. 97 of the NPPF through:

- The recycling of waste material to create a biofuel that will be either combusted or gasified off-site to create a renewable source of heat and power; and
- The development of the combined cycle energy centre will provide both the data centres, the renewable biofuel production plant and other existing and planned development within the surrounding area, with a decentralised source of heat and power to ensure that all uses operate as efficiently and viably as possible.

Waste

4.18 As outlined in para. 5 of the NPPF, it does not contain specific waste policies. Instead, national planning policy for waste is contained within the National Planning Policy for Waste (hereafter NPPW), which was published on October 2014. It outlines that the planning system should play a pivotal role in delivering the Country’s waste planning ambitions, *inter alia* through:

- Driving waste management further up the waste hierarchy;
- Ensuring waste management is considered alongside other spatial planning matters;
- Providing a framework in which communities and businesses are engaged to take responsibility for their own waste, in line with the proximity principle; and
- Securing the re-use, recovery or disposal of waste without endangering human health and without harming the environment.

4.19 The renewable biofuel production plant will handle pre-bundled RDF waste material from the surrounding area, in line with the proximity principle. The waste cannot be re-used and ordinarily it cannot be recycled. The proposed use provides the opportunity for the RDF waste material to be diverted to its highest possible point on the Waste Hierarchy, as it will be recycled to create a renewable biofuel. The scheme has been carefully prepared to ensure that all elements of the proposal, which are separate planning units, are mutually beneficial (see Section 5) and can be delivered in a responsible manner, without harming the environment.

4.20 Para. 6 of the NPPW states that when preparing Local Plans, waste planning authorities should first look to suitable sites and areas outside the Green Belt to accommodate new waste management capacity. Therefore, sites within the Green Belt should only be considered if an adequate portfolio of sites and areas outside the Green Belt could not be identified to meet the
need for new waste management capacity.

4.21 In addition, the NPPF requires authorities to plan for waste management facilities and the provision of energy (including heat).

**Sustainable Transport**

4.22 The NPPF outlines that transport policies have an important role in facilitating sustainable development (para. 29 refers). The smarter use of technology is identified as being one way which can reduce the need to travel. The provision of cloud-based storage systems allows individuals to work and access I.T. facilities from any location, including their home, thus reducing their need to travel to work.

4.23 In addition, the NPPF states that encouragement should be given to solutions which support reductions in greenhouse gases, reduce congestion (para. 30 refers) and that developments plans protect and exploit opportunities for the use of sustainable transport modes for the movement of goods (para. 35 refers).

4.24 The proposed development seeks to transport pre-bundled RDF waste material and where possible transport the biofuel product from the site via the Reading to Tonbridge railway line, utilising the privately-owned railway siding. The use of the railway to transport waste will remove vehicular movements that would likely to have otherwise been made on the highway network. Fewer vehicle movements associated with the transportation of waste will both reduce vehicle congestion and greenhouse gases.

**Green Belt**

4.25 The entire subject site falls within the Metropolitan Green Belt and therefore national planning policy in relation to the Green Belt is relevant.

4.26 It states that the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and permanence (para. 79 refers).

4.27 Paragraph 80 of the NPPF identifies five purposes for including land within the Green Belt. These include:

- To check the unrestricted sprawl of large built-up areas;
- To prevent neighbouring towns merging into one another;
- To assist safeguarding the countryside from encroachment;
- To preserve the setting and special character of historic towns; and
- To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

4.28 Para. 83 of the NPPF states that once the general extent of the Green Belt has been approved it should only be altered in exceptional circumstances, through the review of the Local Plan. The preparation of the new Tandridge Local Plan provides such an opportunity. This is particularly important given the competing development pressures being faced by the Local Authority and that significant amendments to the Green Belt have only been made once since the policy designation came into effect (para. 2.15 and 2.16 of the Green Belt Assessment Methodology refers).
4.29 In relation to Lamb’s Business Park’s contribution to the Metropolitan Green Belt, the Council’s 2016 Part 2 Green Belt Assessment concludes that:

“...the Area does not serve the purposes of including land within the Green Belt, given its siting, the scale of development and existing employment use. Whilst the Area for Further Investigation is located within the countryside, the Business Park is a Strategic Employment Site with a quarry located on the western edge of the site outside the boundaries of the strategic employment designation, and as such is not considered to safeguard the countryside from encroachment. Its highly developed appearance compromises the open character of the Green Belt in this location. Although the site is self-contained and has limited visual impact, it is considered that it should be considered further as part of the Green Belt Assessment in terms of whether or not exceptional circumstances exist” (page 24 of the Green Belt Assessment Part 2, 2016 refers).

4.30 Given the conclusions presented within the Part 2 Assessment Lambs Business Park was subject of a third assessment to consider whether the exceptional circumstances exist to justify the site’s removal from the Metropolitan Green Belt.

4.31 The Report concludes that there are the exceptional circumstances to justify the site’s removal from the Metropolitan Green Belt. Specifically, it states that:

“This site is one of only 3 large, well-performing industrial sites in the district with good access to the strategic road that, alongside Hobbs Industrial Estate and Westerham Road Industrial Estate, forms part of the main reservoir of industrial capacity in the district. In order to ensure that well-functioning sites are safeguarded and there is sufficient suitable land to meet future demand and support the local economy going forward, the evidence considers there is a need to protect the function of this site and enhance its attractiveness and competitiveness for industrial type activities through formal designation as a strategic employment location. Further, the evidence identifies significant capacity for expansion (7.44ha), which provides opportunity to increase overall employment land supply and stem industrial decline across the district. The hatched area on the plan above indicates an area for potential expansion/intensification. The spatial strategy for the district includes the intensification and expansion of existing sites and as such this site is strategy compliant. The site is considered, in principle, suitable for development from an ecology perspective subject to mitigation measures. It also has medium/high capacity for employment development within the landscape, subject to mitigation measures. Opportunity to utilise rail siding to minimise the vehicular movements to the site.

Further, in terms of the Green Belt it has been identified that this site does not serve any of the Green Belt purposes and as such the loss of the site would not result in Green Belt harm; however, it is acknowledged that its development could impact upon the wider Green Belt but that any impact could be reduced through sensitive design and landscaping. It would also be necessary to secure robust and defensible boundaries to ensure harm to the wider Green Belt is minimised and it is considered that the current boundaries would serve this purpose, albeit they may need to be reinforced. However, whilst South Godstone has been identified as having good accessibility, including access to public transport, it is considered that it would be primarily accessed via private car by employees.

In addition, the site promoter is proposing a Green Technology Park and its proposed development represents a significant opportunity for higher-value, higher-density and higher-skills based employment provision, inward as well as spin-off investment, whilst increasing access to jobs for local residents. The intensification of this site in line with the recommendations of the evidence base would make a major contribution to meeting employment needs over the plan period and achieving the Council’s economic development aspirations. It also presents significant opportunities for wider community benefit, including the
environmental benefit of the proposed biomass gasification plant. In addition it would also provide the opportunity to secure biodiversity enhancement opportunities. Opportunity to use former pit areas as flood alleviation and a nature reserve.

Having considered all of the factors set out in section 3 of the paper “Green Belt Assessment Part 3: Exceptional Circumstances and Insetting” it is considered, as a matter of planning judgement, that this site does justify the exceptional circumstances necessary to recommend amendment of the Green Belt boundary.1

4.32 Alongside the Council’s work, WT Lamb have commissioned their own Site Specific Green Belt Assessment (August 2018). The work concludes that the removal of the site from the Metropolitan Green Belt and its development in the manner proposed would neither compromise the fundamental aim of the Green Belt, or the majority of its 5 purposes. Consequently, LRM’s Site Specific Green Belt Assessment reaches similar conclusions as the Council’s work. This report provides additional evidence to demonstrate the exceptional circumstances exist to justify the site’s removal from the Metropolitan Green Belt.

4.33 As such, both the Council and WT Lamb agree that the exceptional circumstances exist for Lambs Business Park to be removed and inset from the Metropolitan Green Belt.

Core Planning Principles

4.34 To aid its role in facilitating sustainable development, para. 17 of the NPPF provides a set of core planning principles, that should underpin both plan-making and decision-taking. In terms of this scheme, WT Lamb consider that it provides a genuine positive opportunity to assist the Local Authority and the County Council to meet their waste, energy, economic and data services needs and aspirations. Whilst the site falls within the Green Belt at the present time, the Council’s own Green Belt Assessment, together with WT Lamb’s Site Specific Green Belt Assessment and this Report, identify the exceptional circumstances to remove the site from the designation, through the new Local Plan. Once the site is removed from the Green Belt, there will be no specific policies in the NPPF that would suggest that development on the subject site should be restricted. Moreover, the benefits provided by the scheme demonstrably outweigh any adverse impacts, when assessed against policies contained within the NPPF as a whole. This is demonstrated in the following paragraphs which assess the scheme against the twelve core planning principles:

4.35 **Be genuinely plan-led and based on joint working and co-operation:** WT Lamb are committed to working with Tandridge District Council, Surrey County Council and other key stakeholders to ensure that the proposals are taken forward through the development plan process. This joint working has culminated in the site’s allocation in the Submission Tandridge District Council Local Plan (Policy SES003) and its allocation to provide new waste management facilities in the Submission Surrey Waste Plan (Policy 11a refers).

4.36 **Not simply be about scrutiny but an exercise in finding ways to enhance and improve places:** The land uses proposed, which are inextricably linked, provide a number of benefits that seek to improve Lambs Business Park and the surrounding area. Such benefits include:

- The site is currently located in the Metropolitan Green Belt. Its necessary redevelopment for the reasons outlined earlier in the Report would enhance and improve one of the most important employment sites in the Local Authority area and would ensure that the Park

1 Green Belt Assessment Part 3, Appendix 1 (2018)
better aligns with the high-value and more productive uses sought by the Council’s emerging Local Plan, its accompanying evidence base and its Economic Proposition;
- It will regenerate an element of a Business Park that will otherwise be lost as an employment resource from 2023 at the very latest. The development of the green technology park will ensure that it is fit for the future;
- The data centres will be exemplar, aiming to attract a global, prestigious business;
- Ensuring that waste is treated geographically closer to where it arises and higher up the waste hierarchy than the current situation. This accords with both the Proximity Principle and the Waste Hierarchy, which as indicated above, are key elements of the NPPW;
- The waste will be treated to create 110,000 tonnes of biofuel each year. The biofuel could be used to create enough electricity to power approximately 55,000 homes annually;
- The privately-owned railway siding provides a unique opportunity for the renewable biofuel production plant operator to receive pre-processed and pre-bundled RDF waste material via a sustainable mode of transport, taking traffic movements off an already stretched highways network. Without the use of the railway, waste would be transported via roads, which would place an additional c.14,000 to 15,000 trips per annum on an already constrained highways network;
- The combined cycle energy centre will provide power to the two data centres, without the need to draw electricity from the Grid. The 40MWe required to power both data centres is enough electricity to power over 83,000 dwellings;
- The use of the residual low-grade heat from the combined cycle energy centre to cool the data centres could save approximately 18MWe. This is the equivalent to the electricity required to power 37,500 homes;
- The proposed development will make a significant contribution to the local economy (see below for further information);
- Cloud based working, which is facilitated by data centres, has the benefit of enabling individuals to work from any location, negating the need to travel long distances to work;
- Intangible indirect economic benefits associated with ‘cloud’ based working;
- The provision of improved broadband facilities for the surrounding environs;
- The restoration of the site earlier than the relevant planning permissions require;
- The proposals provide the opportunity to enhance the visual amenity of the site in landscape terms;
- A biodiversity enhancement will be provided as part of the scheme; and
- A site could be used to accommodate a greater amount of surface water than its greenfield run off rate plus an allowance for climate change.

4.37 Given the above, the development proposals will improve not only the site, but will assist in improving conditions in the surrounding environs, environmentally, socially and economically.

4.38 Proactively drive sustainable economic development to deliver homes, business, infrastructure and thriving local places: The scheme will also meet the need for additional waste processing facilities within Surrey, will increase the quantum of waste material recycled within the County and help achieve the ambition of reducing the quantum of material sent to landfill. In addition, there is a significant demand for data centres within the local authority area, the County and sub-region. Both uses are key elements of the essential infrastructure required to support sustainable

\(^2\) Assuming an average household consumes 4,200kWh per annum in line with a medium profile class 2 user – see https://www.ofgem.gov.uk/gas/retail-market/monitoring-data-and-statistics/typical-domestic-consumption-values

\(^3\) 14,000-15,000 trips each year based on the use of lorries with a carrying capacity of 20 tonnes each and them being fully utilised
economic development in Tandridge and Surrey over the longer term. Both the decentralised energy centre and the renewable biofuel production plant will generate both heat and power that will be used to support other positive economic development outcomes.

4.39 The scheme will also make a significant contribution to the local economy through both the construction and operational phases and fully aligns with economic policy and strategy in the local, sub-regional and wider region (please refer to the accompanying Economic Case and Economic Impact Report). Summarily, the proposals:

- Support an initial capital investment of between £473 million. This would support 402-person years of employment for residents of Tandridge District during the construction phase, generating wages of £14 million and a GVA of £44 million over the four-year construction period. When considering the benefits over the wider functional economic market area (FEMA), 596 person years of employment are anticipated, generating £20 million in wages;
- During the operational phase, approximately 207 FTE net new jobs will be created for residents of Tandridge District, generating £7 million in net additional wages per annum;
- The development is estimated to deliver c.£14 million per annum in net additional annual GVA for the District; and
- At the functioning economic market level, some 465 FTE jobs are estimated to be generated, supporting £14 million in net additional wages per annum. This would generate £35 million in net annual GVA.

4.40 **Securing high quality design:** Whilst the detailed design of the scheme has not been considered at this stage, WT Lamb are committed to ensuring the development proposals constitute an exemplar, high quality design (please refer to the Development Framework Document for more information). To fulfil this ambition, the landowner would voluntarily present their proposals to a design review panel at the appropriate time.

4.41 **Taking account of the difference roles and character of different areas:** The early proposals have been designed having regard to the opportunities and constraints provided by both the built and natural environment and the character of the surrounding area. The character of the surrounding environs has been carefully considered, which has helped inform the development proposals, including its form and scale (please refer to the Development Framework Document for further information).

4.42 In addition, the need and demand for the proposed uses have been carefully considered and framed to ensure that they are mutually dependent upon one another in order to ensure their viable longevity. The proposals also respond to the economic role and character of the area and will assist in the delivery of the area’s economic strategy and policy.

4.43 **Support the transition to a low carbon future:** The renewable biofuel production plant will recycle RDF waste material that would have otherwise been sent to either recovery facilities or landfill and recycle it to form a biofuel. The biofuel will be distributed via the railway line to off-site locations where it will be combusted or gasified to form heat or power. The plant will produce 110,000 tonnes of biofuel each year, which could provide enough energy to power 55,000 homes.

4.44 The renewable biofuel production plant will be fed with pre-sorted and pre-bundled RDF waste material via the railway. It will be the first facility within the County to adopt such an approach...
for the transportation of waste. In transporting waste from the railway into the site, the facility will remove the need for a significant number of vehicular trips. This would help to reduce congestion and the quantum of greenhouse gases that are emitted from the highways network.

4.45 In addition, the combined cycle energy centre will produce 49MWe in a high-efficient and low carbon manner. The production of this decentralised source of power means that the data centres can be powered without the need to draw electricity from the Grid as their primary source of power. This decentralised source of power would save approximately 40MWe being drawn from the Grid, which is the equivalent as enough electricity to power around over 83,000 homes (assuming that, in line with Ofgem 2017 figures, household electrical use is 4200KWh per annum).

4.46 The efficiency of the data centres could also be improved by using the low-grade heat from the combined cycle energy centre to cool their ICT equipment via absorption chillers. This will lessen the electricity demand from each data centre by 40%, which alone could save around 18MWe per annum, which is enough to power around approximately 37,500 homes per annum.

4.47 Any additional residual heat from the combined cycle energy centre will be used in existing and planned development in the surrounding areas to reduce their power requirements. Any residual power will be sold to the Grid.

4.48 **Contribute to preserving and enhancing the natural environment:** Several technical assessments, including those covering landscape, ecology, hydrology and air quality matters have been commissioned to identify potential constraints and opportunities which were presented by the natural environment. These have been taken into consideration when formulating the current masterplan. The proposals also include biodiversity gains and landscape enhancements.

4.49 **Encouraging the effective use of land by reusing land that has been previously developed:** Both data centres are primarily located on elements of the existing Business Park, that by 2023 at the very latest, will, as a result of the EPC rating not be able to be let and will become vacant and redundant (see Appendix 2 for further information). The re-use of this element of the site would therefore fulfil the core planning principle.

4.50 As demonstrated in the Submission Plan, the development requirements in Tandridge District necessitate the development of greenfield sites. Whilst technically development in the existing quarry site would be conceived as being development on a greenfield site, it must, given the long historic industrial uses associated with it, be considered to be more preferable to develop than a genuine, undeveloped greenfield site.

4.51 **Promote mixed use development and encourage the multiple benefits from the use of land:** The proposed development has been carefully framed to ensure multiple benefits from the site’s redevelopment are achieved.

4.52 **Conserve heritage assets in a manner appropriate to their significance:** The development does not result in any impacts on heritage assets (please refer to the Development Framework Document for confirmation).

4.53 **Make the fullest possible use of public transport, walking and cycling:** The transport strategy for the site is outlined in the Development Framework Document. The scheme will reduce the amount of vehicle movements in comparison with an alternative strategy for transporting waste that didn't rely on the railway network. This will primarily be achieved by transporting the
majority of waste via the Tonbridge to Reading railway line to the site, utilising Lamb’s privately-owned railway siding. Such a strategy ensures that the waste is transported to the site in the most sustainable manner, reducing vehicle movements from an already strained highway network (see para. 3.3.1 of the Surrey Waste Local Plan Issues and Options Report), as well as carbon emissions.

4.54 **Support local strategies to health, social and cultural wellbeing:** As detailed above, the scheme has been developed to achieve several benefits that extend beyond the application site boundary. Through direct and indirect provisions, the application will provide a number of benefits to improve health, social and cultural wellbeing. The most obvious is the provision of a facility that will recycle RDF waste material that would otherwise have been sent to either waste recovery facilities or landfill, into biofuel that will be combusted or gassified off-site to create heat and power. This process will ensure that waste is handled within Surrey in a sustainable manner, that is in line with the waste hierarchy and the proximity principle. Moreover, the scheme will remove traffic off an already congested highways network that will again reduce emissions within the surrounding environs. The development of the site will also provide biodiversity and landscape enhancements that could facilitate the provision of new recreational opportunities.

**Summary**

4.55 The analysis presented above demonstrates that the proposed development accords with the national planning policy and particularly the core planning principles of the NPPF, which are applicable to all new development. The benefits delivered by the scheme clearly outweigh any identifiable harm. Specifically, the scheme has been formed to ensure that it delivers sustainable development, providing multiple economic, social and environmental benefits, as required by national planning policy.

4.56 The scheme’s overwhelming alignment with the NPPF provides one key argument to demonstrate that the exceptional circumstances exist to remove the subject site from the Metropolitan Green Belt.
5 Need and Demand for the Development and the Benefits of Co-location

5.1 This section of the report provides an assessment of the need and demand for the proposed development within Tandridge District. It provides an understanding of why Lamb’s Business Park provides an ideal location for the development proposed and the benefits of co-locating the proposed land uses together.

Need and Demand for Data Centres

5.2 The following section provides an assessment for need for data centres. A summary of the latest general trends in the data centre market, followed by a more in-depth view of the demand for data centres in Surrey and Tandridge District is provided.

General Market Trends

5.3 According to Arup the data centre industry consumes around 6% of the world’s electrical supply and accounts for around 2% of global greenhouse gas emissions. These figures could increase further, particularly with data traffic more than doubling every four years.

5.4 According to Tariff Consultancy’s Report ‘Datacentre Europe Pricing Report’ (2015), the amount of space and power consumed by European data centres is likely to increase by nearly 20% in the period up to 2020. This will be largely driven by the demand for cloud-based services and applications, which are for many companies are replacing traditional hardware due to the agility offered and lower operating and outlay costs. The Report highlights that a significant amount of the demand for data centres will be met in the U.K., underlining its role as the focal point for the data centre market within Europe.

5.5 Whilst traditionally data centres would have been located within city centres, operators are now looking for opportunities in other areas. The reasons behind the geographic shift can be summarised as being:

- Security – against a backdrop of an increased risk of terrorism, operators are concluding that city centres are not the safest location to house new facilities;
- Flood risk – many cities with a high demand for cloud-based systems and applications are located in areas susceptible to flood risk (i.e. Paris, Amsterdam and London);
- Real estate costs – the price of acquiring land in city centres will be higher than acquiring land elsewhere;
- Higher costs of securing rack space in data centres – Tariff Consultancy has calculated that prices in London are 27% higher than data centres outside the M25;
- Employment costs – employee costs are traditionally higher within city centres; and
- Power reliability – data centres need to be connected to reliable sources of electricity. This often leads to data centres being located in suburban or out of city centre locations, where

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5 https://www.datacenterdynamics.com/opinions/power-consumption-data-centers-global-problem/
6 http://www.datacentre.me/downloads/Documents/Data%20Centre%20Pricing%20in%20Europe%202015%20to%202020%20-%20table%20of%20contents.pdf
large grid capacity is more likely. This is frequently not the case in urban locations due to development constraints on grid infrastructure.

5.6 Given the constraints within city centres, many data centre operators have looked for edge of city locations. As well as overcoming the constraints associated with city centre locations listed above, edge of city locations still provides a similar level of connectivity and latency. This is extremely important for large corporate clients where they require large quantities of data frequently.

5.7 On the flip side, edge of city locations cannot be too far from city centres, where often IT engineers are based. Good accessibility to out-of-city data centres ensures that engineers are able to fix any hardware issues in the event of an emergency.

Local Market Trends

5.8 Advice provided to WT Lamb by CBRE has suggested that the London data centre market is the largest data centre market in Europe.

5.9 Within London, there are three data centre sub markets: Docklands, City and the wider London market. The extent of the wider London market is identified in Figure 1. It covers an area from Crawley to the south; Stevenage to the north; Brentwood to the east; and Maidenhead to the west. Lambs Business Park is located within the London market.

Figure 1: London Market

Source: CBRE

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7 Premier colocation Report, London Market, Q2 2018 Update and additional advice received in August 2018
5.10 At a more local level there is also demand for data centres within Tandridge District and Surrey, primarily for the following reasons:

- There are currently a limited number of sizeable logistics development schemes planned in London City Centre. There are very few choices for potential occupiers requiring large-scale premises. CBRE is actively working for companies who are looking for such premises;
- The competitive landscape in the industrial sector within the wider London area makes it difficult for data centre developers to secure sites. Moreover, there are key locational requirements for data centres, which include power availability, fibre optic connectivity and low risk environments. This therefore makes finding suitable sites increasingly more difficult. Any site which has been allocated for a data centre use within the planning system will be carefully considered by operators; and
- There is a significant demand from cloud providers who have been responsible for acquiring large amount of data centre space in the European markets. They are becoming increasingly more aggressive and are actively seeking space within the London market.

5.11 The analysis presented by CBRE therefore confirms that there is currently a high demand for data centre space in the wider London market, within which Lambs Business Park is located. As a B8 land use, data centres are beginning to compete with traditional storage and distribution uses in out of London locations. The development of purpose-built data centres in Tandridge District will ensure that the demand is met in a planned manner, without undermining other economic development and employment land and premises objectives.

Need and Demand for the Renewable Biofuel Production Plant

5.12 As indicated above, the proposed facility will be fed by pre-sorted and pre-bundled RDF waste, imported into the site by the railway network, which connects to WT Lamb's privately-owned railway siding.

5.13 The renewable biofuel production plant will process up to 150,000 tonnes of RDF waste per year, which will comprise commercial and residual wastes.

5.14 The waste used in the process will be the residual waste streams left after extracting elements that could be used for other recycling purposes. The plant therefore handles residual waste that ordinarily would have no further value as recyclate, at the highest possible stage within the Waste Hierarchy (recycling). If this waste is not handled within such a facility, it will either be handled in a recovery facility, or disposed at landfill. These alternatives would run contrary to both the Waste Hierarchy and Surrey County Council’s aim to achieve zero waste to landfill by 2033 (the Forward in the Submission Surrey Waste Plan refers). In line with the proximity principle, it is right and proper that waste arising in Surrey is handled within the County, rather than being transported further afield. Such a strategy would be unsustainable.

Existing Situation

5.15 Work undertaken by the County Council (Table 24 of the Waste Needs Assessment 2019 refers) demonstrates that in 2017 the County sent 855,000 tonnes (23%) of waste arisings to landfill. An additional 655,000 tonnes was sent to ‘other recovery’ of which 212,000 tonnes is sent to energy recovery.
5.16 As indicated above, the County Council are striving to achieve zero waste to landfill and therefore it will be necessary for waste arising within these streams to be handled further up the Waste Hierarchy.

**Figure 2: Summary Waste Management Profile for Surrey 2017 - Tonnes**

<table>
<thead>
<tr>
<th>Waste Stream</th>
<th>Local Authority Collected Waste</th>
<th>Commercial and Industrial Waste</th>
<th>Construction, Demolition and Excavation</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Recycled</td>
<td>268,000</td>
<td>423,000</td>
<td>1,446,000</td>
<td>2,137,000</td>
</tr>
<tr>
<td>Organic Food Arisings</td>
<td>37,000</td>
<td>27,000</td>
<td></td>
<td>64,000</td>
</tr>
<tr>
<td>Other Recovery (including Energy Recovery)</td>
<td>204,000</td>
<td>27,000</td>
<td>424,000</td>
<td>655,000</td>
</tr>
<tr>
<td>Residual Waste to Landfill</td>
<td>27,000</td>
<td>205,000</td>
<td>623,000</td>
<td>855,000</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>536,000</strong></td>
<td><strong>682,000</strong></td>
<td><strong>2,493,000</strong></td>
<td><strong>3,711,000</strong></td>
</tr>
</tbody>
</table>

5.17 Figure 2 above, which is data extracted from the County Council's Waste Needs Assessment 2019, provides an assessment of waste arisings by management profile. It demonstrates that there is currently 463,000 tonnes per year of LACW and C & I waste per annum arising within Surrey that could be used within the proposed renewable bio-fuel production plant, which comprises: 204,000 tonnes of LACW waste and 27,000 tonnes of C and I waste sent to 'other recovery'; and 27,000 tonnes of LACW waste and 205,000 tonnes of C & I waste sent to landfill).

**Existing and Planned Waste Infrastructure in Surrey and the South East**

5.18 At present, there are no energy from waste or renewable biofuel productions facilities within Surrey. As outlined in para. 3.2.1.2 of the County’s Waste Needs Assessment, 212,000 tonnes of residual LACW sent to energy recovery, was exported out of County. This waste was handled in Kent (41%), London (19%), Berkshire (10%), Essex (8%), and Mainland Europe (41%).

5.19 Only one new energy from waste facility is planned within Surrey – Shepperton. The proposed gasification facility will treat up to 55,000 tonnes of waste collected from homes and some local businesses in northern Surrey, per annum.
Future Waste Generation and Management Capacity

5.20 As indicated above, Surrey County Council has a target of sending zero waste to landfill. This means that the current 232,000 tonnes of LACW (27,000 tonnes) and construction and industrial waste (205,000 tonnes) sent to landfill will need to be treated further up the Waste Hierarchy (refer to Figure 2 above). In addition, 231,000 tonnes of waste is treated within 'other recovery' facilities, which sit below the recycling use within the Waste Hierarchy. A significant portion of this waste is also handled out of County. In accordance with the proximity principle, it should be handled as close to the point of generation as possible – within Surrey.

5.21 In addition, as outlined in the emerging Waste Plan, the County’s population is projected to reach 1.37 million by 2037, an increase of 16% from 2017. The local economy is also predicted to grow. As a result, the County Council forecast that the waste arisings will continue to increase in the period up to 2035. This is shown in Figure 3 below:

Figure 3: Total Waste Arisings Forecast

<table>
<thead>
<tr>
<th>Year</th>
<th>Waste from Households</th>
<th>Commercial and Industrial</th>
<th>Construction, Demolition and Excavation Waste</th>
</tr>
</thead>
<tbody>
<tr>
<td>2017</td>
<td>536,000</td>
<td>682,000</td>
<td>2,494,000</td>
</tr>
<tr>
<td>2020</td>
<td>540,000</td>
<td>744,000</td>
<td>2,494,000</td>
</tr>
<tr>
<td>2025</td>
<td>549,000</td>
<td>848,000</td>
<td>2,494,000</td>
</tr>
<tr>
<td>2030</td>
<td>557,000</td>
<td>951,000</td>
<td>2,494,000</td>
</tr>
<tr>
<td>2035</td>
<td>566,000</td>
<td>1,055,000</td>
<td>2,494,000</td>
</tr>
</tbody>
</table>

Source: Table 24 of the Submission Surrey Waste Plan (2019)

5.22 The table above demonstrates that waste from households is predicted to increase by 5.6% from 2017 volumes in the period to 2035 and commercial and industrial waste by 55%.

5.23 Research by Sol Environment (refer to the Development Framework Document) identifies that the County Council’s evidence base has shown that when comparing the supply of waste arisings and the capacity of waste facilities within the County up to 2033, there was a significant undersupply of facilities and therefore there is the need to encourage new waste management facilities within the County. The proposed renewable biofuel production plant at Lambs Business Park could therefore assist address this deficit.

Impact of the Proposal

5.24 The renewable biofuel production plant would have the capacity to recycle approximately 150,000 tonnes of RDF.

5.25 Currently RDF wastes produced within the County are exported for treatment elsewhere (212,000). The County Council’s ambition to send zero waste to landfill will also result in the need for more waste to be treated further up the Waste Hierarchy.
The proposed renewable biofuel production plant would therefore reduce the need to export residual waste out of the County, which accords with the Proximity Principle.

**Figure 4: Summary of the Assumed Current and Future Tonnage of Waste Sent to Energy from Waste, the Infrastructure Available in Surrey and the Effect of the Proposed Development**

<table>
<thead>
<tr>
<th>Current Situation</th>
<th>Local Authority Collected Waste (tonnes per year)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Current waste sent to EfW from Surrey</td>
<td>212,000</td>
</tr>
<tr>
<td>Current capacity of EfW in Surrey</td>
<td>0</td>
</tr>
<tr>
<td>LACW currently landfilled</td>
<td>27,000</td>
</tr>
<tr>
<td>C&amp;I currently landfilled</td>
<td>205,000</td>
</tr>
<tr>
<td>Total capacity required assuming all LACW and C&amp;I waste suitable for recovery or higher</td>
<td>444,000</td>
</tr>
</tbody>
</table>

**Future Waste Generation (2035)**

<p>| | |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>LACW</td>
<td>566,000</td>
</tr>
<tr>
<td>C&amp;I</td>
<td>1,055,000</td>
</tr>
<tr>
<td>Total</td>
<td>1,621,000</td>
</tr>
</tbody>
</table>

**Future and Proposed Infrastructure**

<p>| | |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Shepperton EfW Facility</td>
<td>55,000</td>
</tr>
<tr>
<td>Total Future a Proposed Infrastructure</td>
<td>55,000</td>
</tr>
<tr>
<td>Deficit</td>
<td>1,566,000</td>
</tr>
<tr>
<td>Lambs Business Park</td>
<td>150,000</td>
</tr>
<tr>
<td>Overall Deficit with Lambs Business Park (2033)</td>
<td>1,416,000</td>
</tr>
</tbody>
</table>
5.27 As demonstrated in Figure 4 above, even when factoring in the proposed renewable biofuel production plant at Lambs Business Park, there will still remain a significant deficit at 2035 of waste treatment capacity within Surrey. If waste is to be handled in accordance with the Waste Hierarchy and the Proximity Principle, there is a clear and significant demand for new waste recycling treatment facilities within Surrey.

Need for Employment Land

5.28 The Economic Needs Assessment Update (2017) (hereafter ENA) provides an assessment of the current commercial property dynamics, including a survey of existing businesses; an estimate of the District’s future need for employment land; and an assessment of the existing development opportunities at existing sites in the District and any residual requirements.

5.29 Figure 15 of the Employment Needs Assessment (2017) identifies a number of employment scenarios which generate a range of employment land requirements. This is summarised in Figure 5 below:

**Figure 5: Comparison of Employment Land Demand Scenarios, 2013-2033**

<table>
<thead>
<tr>
<th>Forecast</th>
<th>Overall (ha)</th>
<th>B1a/b (ha)</th>
<th>B1c/B2 (ha)</th>
<th>B8 (ha)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Labour demand baseline scenario</td>
<td>15.3</td>
<td>8.6</td>
<td>2.0</td>
<td>4.7</td>
</tr>
<tr>
<td>Labour demand growth scenario</td>
<td>22.5</td>
<td>12.7</td>
<td>4.1</td>
<td>5.7</td>
</tr>
<tr>
<td>Past Completions from 2006/7</td>
<td>4.8</td>
<td>3.8</td>
<td>0.7</td>
<td>0.4</td>
</tr>
</tbody>
</table>

5.30 The emerging Local Plan seeks to meet the ‘baseline’ scenario. In order to assist meet this need for additional employment land, Lambs Business Park is allocated in Policy SES003 to provide 8ha of additional employment space. It is the largest employment allocation in the District, which underlines its significance as one of four Strategic Employment Sites.

5.31 As indicated above, in addition to the 8ha expansion area, there are additional areas of underutilised and undeveloped space that could be used to deliver higher-value and more productive uses within Lambs Business Park.

Combined Cycle Gas Turbine

5.32 As previously outlined, there is a significant demand for data centre space within the London Market, which includes Tandridge District. Data centres are high consumers of power. The provision of the combined cycle energy centre ensures that the data centres can be powered in...
a decentralised and highly efficient manner that does not place an additional burden on the National Grid. Moreover, the use of the residual heat from the combined cycle energy centre to cool both data centre's ICT equipment will ensure that they are more efficient and will reduce their electricity requirements.

5.33 Again, as demonstrated above, there is a significant requirement for additional waste facilities within Surrey. The residual low-grade heat from the combined cycle energy centre will also be used as the critical element of the drying process in the operation of the renewable biofuel production plant in recycling waste into a biofuel. Without the low-grade heat, there would be a need to covert power from the Grid into heat, or for an alternative form of waste processing, which would involve a combustion or gassification process.

5.34 Any residual heat left over from the drying process, could also be used to heat and cool other existing and planned developments in the surrounding area, in addition to the data centres.

The Benefits of the Co-location of the Proposed Uses

5.35 The co-location of the three elements of the proposed development on Lambs Business Park provides a number of competitive advantages over the piecemeal development of each land use on separate sites. These are summarised in the following paragraphs.

Viability

5.36 The co-location of the proposed uses will improve their viability, ensuring both their deliverability and longevity. The operators of the combined cycle energy centre will produce decentralised electricity and will be able to sell their power to the data centre and renewable biofuel production plant operators, at a price above the wholesale price they would achieve by selling directly to the National Grid, whilst the other operators will be able to purchase the power directly from the combined cycle energy centre at a price point less than utility provider’s retail prices. Any residual power will be sold to both existing or proposed developments in the surrounding area (including within the Park), or sold to the Grid.

5.37 As indicated above, the scheme has been formed to make use of the significant residual heat from the combined cycle energy centre. The residual heat could be sold to the data centre operators and used to cool their ICT equipment through absorption chilling. This would reduce the electrical requirements of each data centre by around 40% (around 18MWe for a high energy operator, which is enough energy to power approximately 37,500 homes per annum). The purchase price of the heat will be less than the data centre operator would pay for the equivalent electricity from the National Grid.

5.38 In addition, between 6-10MWth will be sold to the operator of the renewable biofuel production plant to facilitate the necessary drying process. Again, this will be sold at a lower price than a conventional power connection.

5.39 Other opportunities will also be explored by the operator of the combined cycle energy centre to sell further residual heat for the purposes of heating and cooling in existing and proposed developments in the surrounding area, including new employment premises at Lambs Business Park.

5.40 Without the co-location of the three elements, the operator of the combined cycle energy centre would be unable to sell the residual heat, which would both worsen the efficiency and the
viability of the scheme.

5.41 The co-location of potential heat customers and suppliers is also a national planning policy consideration (please refer to the planning policy section of this report).

**Biofuel Production**

5.42 The location of the renewable biofuel production plant alongside the combined cycle energy centre ensures that the low-grade heat bi-product from the combined cycle energy centre can be used in the drying process to recycle waste material into biofuel.

5.43 It is estimated that approximately 110,000 tonnes of biofuel will be produced each year, which when burnt or gasified off-site, could create enough electricity to power c.55,000 homes in a highly sustainable manner.

**Power Availability**

5.44 A key locational factor for a data centre operator is ensuring that there are multiple and reliable electrical connections. Data centres operators cannot afford for their facilities to be ‘off-line’.

5.45 The co-location of the data centres with the combined cycle energy centre ensures that the data centres will have a reliable and decentralised power source. Back-up power can be provided from the railway line (subject to the successful conclusion of discussions with Network Rail), National Grid connections and back-up generators. This provides a key competitive advantage over other locations for data centres where conventional Grid connections have been employed.

**Power Efficiency**

5.46 The co-location of the proposed land uses will ensure that the power output from the combined cycle energy centre is more efficient than if the power was supplied straight to the National Grid.

5.47 Without the data centres and the renewable biofuel production plant, the power generated from the combined cycle energy centre would be supplied directly to the Grid and would therefore be subject to the following:

- **Transformation losses** – the power generated by combined cycle energy centre would need to be stepped up in voltage to match the grid supply in the area. This process would incur power losses (heat and noise) from the transformer.
- **Distribution losses** – as electricity is distributed over the network, energy will be lost as heat (due to the resistance of the cables). The distance the power needs to travel between the point of generation and the point of use will determine the level of energy lost.

5.48 To improve the efficiency of the energy produced at the combined cycle energy centre the output from it will match the distribution voltage at the data centres and the renewable biofuel production plant. Similarly, the close proximity between both land uses (under 100m) will ensure distribution losses are kept to a minimum.

**The Need for Green Belt Release**

5.49 Policy TLP01 (Spatial Strategy) states that the Council will provide 6,056 dwellings in the period
up to 2033. This is below the Council’s objectively assessed level of housing over the same period, which is calculated by the Council as being 9,400 dwellings between 2013 and 2033. In addition, the Local Plan makes provision for at least 15.3ha of B-class employment space (Policy TLP01 refers). Without developing on Green Belt sites, the emerging Local Plan’s housing and employment provision targets would not be met. Moreover, without development in the Green Belt, the County’s waste management needs would also not be met. This is demonstrated in the following paragraphs:

**Housing**

5.50 In 2015, the Council carried out an assessment of its local housing need. The findings of this assessment determined that Tandridge District Council had an objectively assessed need for housing (OAN) of 9,400 dwellings between 2013 and 2033. National policy, coupled with its guidance, makes it clear that the OAN is a ‘starting point’ for determining a housing requirement. It is only through the application of evidence and the consideration of constraints that a delivery target can be reached, and which may be justifiably different from the OAN. Having undertaken this assessment, the Council have concluded that the emerging housing target should be limited to 6,056 dwellings up to 2033.

5.51 Information presented in the 2017-18 HELAA, as updated by the Interim 2019 HELAA, indicates that 12 non-Green Belt sites that were found to be deliverable and developable, with a capacity for 349 dwellings. Even once existing supply (permissions and completions – 2,334 dwellings), windfall provision (435 dwellings), town centre initiatives (250 dwellings) and other sources of supply (336 dwellings), it would only yield a total supply of 3,704 dwellings. This is significantly short of the quantum of housing land required to meet either the housing requirement in the Local Plan, or the objectively assessed needs.

**Employment Land**

5.52 Policy TLP01 states that the Council will seek to support the delivery of at least 15.3ha of B-class employment space.

5.53 Chapter 6 of the 2017 Economic Needs Assessment Update provides an assessment of existing and potential employment land within the District. These findings have been used by the Council to inform their latest SHELAA. Table 4 of the 2017-18 HELAA, as updated by the 2019 HELAA, provides a list of the existing and potential sites reviewed within the Economic Needs Assessment. Of the 36 sites assessed, only 3 sites, which together would provide 3.48ha of employment land provision, were not located within the Green Belt.

5.54 Accordingly, without developing on Green Belt sites, the employment land requirement as outlined within the emerging Local Plan could not be met.

**Waste**

5.55 As outlined in the emerging Waste Plan, "unless some Green Belt land is allocated there will be no certainty that sufficient land can be developed to meet the identified need for additional waste management capacity"(para. 4.3.2.3 refers). Consequently, there is an identifiable need to identify sites suitable for accommodating waste uses within the Metropolitan Green Belt within Surrey.

5.56 The allocation of land within the Metropolitan Green Belt is therefore a legitimate planning response to meeting the need for new waste facilities within the County. Accordingly, the emerging Waste Plan identifies Lambs Business Park as a proposed strategic waste site.
allocation (Draft Policy 11a refers).

**Implications**

5.57 Given the information presented above, in order to meet objectively assessed development, there will be a clear need to amend Green Belt boundaries; exceptional circumstances have been demonstrated to amend the Green Belt in the Local Plan Review (para. 83 of the NPPF). Sites which contribute least to the purposes to the Green Belt and can deliver sustainable development should be taken forward to inclusion as allocations in the next iterations of the Plan.

5.58 In this regard we note that the conclusions of both the evidence base supporting the emerging Tandridge Local Plan and the emerging Surrey Waste Plan, both of which acknowledge the suitability of the site to accommodate the proposed development. As indicated above, the Tandridge Local Plan Green Belt Assessment Part 3 concludes that the exceptional circumstances exist to remove and inset Lambs Business Park from the Metropolitan Green Belt.
6 Comparative Assessment

6.1 This section of the report provides an assessment of how Lambs Business Park compares to other opportunities in the wider area to accommodate the proposed development in its complete and comprehensive form. The assessment draws on key locational considerations for both uses as evidenced by industry standard site requirements. It seeks to demonstrate that Lambs Business Park provides a unique opportunity to meet the identified need and demand for the proposed uses.

Methodology

Proposed Development

6.2 The previous section of the report identified there are strong competitive advantages of collocating the proposed uses. The multiple benefits of the co-location of the proposed land uses would be lost if the proposals were taken forward on separate sites, in a piecemeal fashion. Given the inextricable link between both land uses, the assessment will compare Lambs Business Park with other sites within Surrey and Sussex that are suitable for accommodating both uses.

6.3 As indicated in section 3 of this report, WT Lamb Holdings is seeking both the emerging Surrey Waste Plan and the Tandridge Local Plan to allocate the subject site for:

- A c.5,418sq.m combined cycle energy centre (up to 49MWe), incorporating a renewable biofuel production plant;
- 2 no. 9,245 sq.m data centres (over 2-3 storeys), with associated supplementary energy centres (decentralised CCGT);
- The use of the former pit areas for flood alleviation and as a nature reserve;
- The intensification and the redevelopment of underutilised areas of the Business Park to provide higher-value and more productive employment opportunities; and
- Education and learning opportunities to be explored.

6.4 These uses will be developed on a c.10ha parcel of land. Excluding the large area of landscaping proposed, which may not be required at alternative sites, the required site area is c.8ha. Accordingly, the comparative assessment will exclude sites below 8ha, as it is considered that they will be unable to provide the quantum of land required to accommodate the development.

6.5 As indicated in the Development Framework Document, the proposals seek to create a development that will become an exemplar for other similar proposals. Accordingly, it seeks to meet the most rigorous industry standard criteria for site selection.

Assessment Area

6.6 A number of important "pre-analysis" considerations have been made in order generate a list of potential sites to inform the comparative assessment. As a starting point, it was considered appropriate to identify sites that relevant Authorities have considered suitable for waste uses and then to assess whether they would meet the relevant requirements for market leading data centres.

6.7 The initial area of search comprises the Surrey County Council and West Sussex County Council
administrative areas. This therefore allows for a consideration of sites deemed suitable for waste facilities in both Counties. Such a wide geography reflects the significance of the scheme in the local and sub-regional context.

6.8 Surrey County Council’s Waste Plan dates to 2008 with a current review in progress, whilst West Sussex County Council have recently adopted their Waste Plan (2014). As part of these processes considerable work has been undertaken by both Authorities to identify sites that were suitable or potentially suitable for waste uses. These sites were all taken forward for further consideration. Clearly if sites are not considered to be suitable for waste facilities, they will not be able to accommodate the proposed development in the comprehensive manner required.

6.9 In their Adopted Waste Plan, Surrey County Council identified a number of site allocations and potential urban sites that might be suitable to accommodate Waste facilities (subject to detailed considerations). More recently, Surrey County Council have published their Part 2 Submission Plan, which identifies sites and industrial land areas of search considered to be suitable for accommodating waste uses in the County up to 2033. The sites and the industrial land areas of search identified in the Part 2 Plan have been considered for their potential to accommodate the proposed development.

6.10 Similarly, in their Waste Local Plan (2014), West Sussex County Council allocated sites that they considered suitable for waste related developments. However, unlike Surrey County Council, they did not identify urban sites that would be suitable due to what they considered to be the uncertainties with such a process.

6.11 In total a list of 88 sites were identified as being potentially capable of supporting the development of the proposed renewable biofuel production plant. The 88 sites have been taken forward for further assessment and are listed in Appendix 5 of this document.

6.12 The identified sites are considered to provide the most up-to-date snapshot of sites within Surrey and West Sussex that are considered suitable within each area for waste facilities.

Assessment Criteria

6.13 The comparative assessment was undertaken utilising a four-stage sieve exercise, as follows:

1. **Site size** - As indicated above, only sites of 8ha or more will be considered as part of the second stage assessment. Sites of less than 8ha are of an insufficient size to accommodate the proposed development.

2. **Rail siding** - The privately-owned rail siding is a key feature of WT Lamb’s development proposals. It will enable all pre-sorted and pre-bundled RDF waste to be brought to the site via a sustainable method of transport, reducing vehicle trips on an already constrained highways network. Such a strategy receives support from the emerging Surrey Waste Plan (Policy 15 refers) and national planning policy. Consequently, it is considered that only sites that have an existing railway siding, or that have the potential to connect to an existing railway line, will be taken forward to the third stage of the assessment. Whilst we are aware that Network Rail will permit, in some circumstances, the loading and unloading of material from live railway tracks, it is considered that the frequency of delivery required to support the renewable fuel production plant of the size proposed would make this option undeliverable.

3. **Industry standard requirements** - Data centre operators have industry standard criteria
when assessing the suitability of sites for such use. The scheme seeks to adhere to the highest criteria for site selection to ensure the development becomes a benchmark for other similar proposals. The criteria will be applied at the third stage of the assessment. A summary of each consideration is provided below:

- **Accessibility by train:** As indicated in section 5 of this report, there is a strong demand from data centre operators for edge of city locations. However, in the case of an emergency, there is a requirement that the site can be accessed by an engineer within a 1-hour travel time, primarily by the railway network. For sites surrounding London, this is measured from London Bridge as it is near financial institutions in the City of London, as well as where I.T. engineers have traditionally clustered.

- **Accessibility by road:** As with the site’s accessibility by train, data centre operators require strong transport links to the strategic highway network. The industry standard requirement is for sites to be located within a 15-minute drive time of a motorway junction. In locations around London, the requirement is for sites to be located within a 15-minute drive time of a junction connected to the M25.

- **Accessibility by helicopters:** To ensure engineers can be on-site in the event of an emergency, sites should be located within a close proximity to a helipad/aerodrome. For sites around London, this means being within an hour’s commute from London Bridge, primarily via a helicopter.

- **Flood Risk:** To ensure that data centres are not at risk of flooding, the industry standard requirement is for them to be located in Flood Zone 1, with a 1 in 1,000-year risk of flooding.

- **Mains Power Supply:** Whist a 50MWe main power line should be available for all sites. It is assumed that the combined cycle energy centre would be the main source of power for both data centres.

- **Dual Power:** To minimise the risk of data centres being off-line for extended periods, data centres should have several sources of power available. For the purposes of this assessment it is assumed that an adequate level of back-up power is available for each site, or that it could be provided at a cost borne to the developer.

- **Fibre Optic Connections:** It is essential that data centres have access to high quality fibre optic connections from multiple providers. For the purposes of this assessment it is assumed that adequate fibre optic connections are available for each site, or that they can be provided at a cost borne to the developer.

- **Site Prominence:** Data centre operators require discrete locations for security reasons. The sites should have security fencing, should not be visually prominent and have one access. Sites that are visible from main roads would not pass the assessment criteria.

Only sites which meet all the above criteria will proceed to stage 4.

4. **Availability** - Stage 4 of the assessment will consider whether each site is genuinely available for the development of the proposed uses.

6.14 Having undertaken the four-stage assessment, the report will identify all sites which are capable of accommodating two data centres, a renewable biofuel production plant, a combined cycle energy centre and employment opportunities.
Assessment

Stage 1 Assessment

6.15 As indicated above, 88 sites were identified as being suitable for accommodating a waste facility in Surrey and Sussex. These sites were therefore taken forward to the first assessment stage, to assess whether they were large enough to accommodate a combined cycle energy centre, a renewable biofuel production plant, two data centres and additional employment opportunities. As indicated above, it is considered that an 8ha site would be required to accommodate both land uses.

6.16 As demonstrated in Appendix 5, 45 sites did not meet the required site size threshold and therefore were not taken forward for further consideration. The sites considered to be too small to accommodate the development were:

- BP, Waterside Drive, Walton;
- Middleton Industrial Estate, Guildford;
- Vokes Site, Normandy;
- Wells Place Industrial Estate, Redhill;
- Littleton Lane, Shepperton;
- Admiralty Way Trading Estate, Camberley;
- Bourne Mill Trading Estate, Farnham;
- Cranleigh Trading Estate, Cranleigh;
- Sheerwater Industrial Estate, Woking;
- Riverway Estate, Peasmarsh;
- Hersham Road North;
- North and South of Lysons Avenue;
- Perrywood Business Park;
- Byfleet Road Employment Allocation;
- Coxbridge Business Park;
- Petworth Road, Witley;
- Charlton Lane, Shepperton;
- Copyhold Works, Redhill;
- Heather Farm, Horsell;
- Land at Earlswood Depot and Sewage Treatment Works;
- Land at Randalls Road, Leatherhead;
- Oakleaf Farm, Stanwell Moor;
- Land at Martyrs Lane, Woking;
- Land adjacent to Trumps Farm, Longcross;
- Weylands Treatment Works, Hersham;
- Lyne Lane, former compost site;
- Reigate Road Quarry, Betchworth;
- Shoreham Harbour;
- Site adjacent to Sewage Works, Ford;
- Ford Airfield;
- Hobbs Barn;
- Blue Prince Mushroom Site;
- Land South of Strettington Flyover;
- Fuel Depot, Bognor Road;
- South East Corner of Tangmere Airfield;
- Woodhorn Farm;
- Duncton Quarry;
- Old Lime Works;
- Cockling Chalkpit;
- Nowhurst Business Centre;
- Chantry Lane;
- Star Road Trading Estate;
- Golding Barn;
- Broadbridge Farm;
- Land at North Farm;
- Hampers Lane Industrial Estate;
- Burleigh Oaks Farm;
- Freshfield Lane Brickworks; and
- Land adjacent to Sewage Works, Cuckfield.

6.17 A further 13 sites were considered as being unsuitable for waste uses by West Sussex County Council. Consequently, 62 sites were dismissed from further consideration at the first stage.

Stage 2 Assessment

6.18 The second stage of the assessment considered whether the remaining 27 sites have either a privately-owned railway siding or are located adjacent to a railway line and therefore could develop a new railway siding that connected to the existing railway network. To meet the second criteria, candidate sites had to be located adjacent to existing railway lines, with no third-party land between the site and the railway track.

6.19 Of the remaining 27 sites, only 14 sites had either a railway siding, or the ability to provide a railway siding (see Appendix 6). The 13 sites were dismissed from further consideration were:

- Thorpe Industrial Estate, Crabtree Road, Thorpe;
- Slyfield Industrial Estate: Land to the North East;
- Slyfield Industrial Estate;
- Molesey Industrial Estate;
- Land at Burnt Common Warehouse;
- Windmill Road Industrial Area;
- Dunsfold Park;
- Northumberland Close Trading Estate, Stanwell;
- Hobbs Industrial Estate, Newchapel;
- Coxbridge Sandpit, Farnham;
- Goldsworth Park Industrial Estate, Woking;
Land at the former Airfield, Wisley; and
Land adjacent to Goddards Green Waste Water Treatment Works.

6.20 It should be noted that of the 14 remaining sites, only two have a railway siding connecting to the railway network (Lambs Business Park and Salfords Industrial Estate). Whilst new railway siding connections are possible, cost estimates provided by Arup indicate that they could be as much as £1,000 per sq.m. Moreover, getting approval from Network Rail could be a lengthy process and may not be operationally feasible. The development of a new siding would therefore introduce a greater risk to the deliverability of a project when compared to the site with an existing railway siding.

Stage 3 Assessment

6.21 As indicated above, 14 sites were taken forward to the third stage of the assessment. At this stage, each site was assessed against industry standard requirements to assess their suitability for accommodating data centres. In the context of the development aspiration to develop market leading data centres, the highest criteria standards were applied. The analysis of each site against each criterion is presented in Appendix 7.

6.22 Of the remaining 14 sites, only 1 was suitable for accommodating data centres; Lambs Business Park. The main reasons for each site being discounted from further consideration were:

- Multiple points of access – Of the 14 remaining sites, 11 sites had multiple points of access. This would increase the security risk for data centre operators to an unacceptable level.
- Site prominence – 12 of the remaining 14 sites are visually prominent from main roads in the surrounding environs. This would increase the security risk for data centre operators to an unacceptable level. Moreover, having a strong visual presence may be a strong constraint against the development of both a combined cycle energy centre and a waste processing plant through increased opposition.
- Flood risk – 7 of the candidate sites were either located or were partially located within a Flood Zone 2 or 3. Data centre operators will only construct facilities within the lowest possible risk of flooding (Flood Zone 1).
- Proximity to the M25 – In the case of an emergency, 4 of the candidate sites were located too far from the M25. This would lead to a significant delay in engineers being able to access the site from the highway network and would therefore not be considered as being suitable for data centre uses.

6.23 Salfords Industrial Estate is the only other site that has been assessed that benefits from an existing railway siding. There are however a number of constraints that would make the site’s development for data centres difficult and include its visual prominence and its multiple points of access. It also has a number of existing operators, in a number of ownerships. Accordingly, these ownership issues would need to be resolved before a comprehensive redevelopment of the site to accommodate the proposed uses could be delivered. Without resolving such matters, it is unlikely that there would be sufficient land available to accommodate the proposed development. However, and as outlined in Section 3 of this document, the Salfords site will be used, within the existing permissions that it benefits from, to transport pre-sorted and bundled waste RDF to Lambs Business Park where it will be recycled.

6.24 Given the analysis presented above, of the sites assessed, only Lambs Business Park can
accommodate a combined cycle energy centre, two data centres, a renewable biofuel production plant and additional employment opportunities.

**Deliverability**

6.25 It should be noted that the assessment has not provided any analysis on whether any of the original 78 sites are genuinely available for the large-scale development proposed. For the vast majority of sites this would mean the demolition of existing premises and its complete redevelopment. Certainly, of the 11 Stage 3 sites, the majority appeared to be well occupied and were unlikely to become available for redevelopment over a similar timescale as Lambs Business Park, where there is certainty that a redevelopment opportunity exists. Lambs Business Park therefore provides a greater certainty that the site will be available to meet the needs for economic development, waste processing and data centres.

**Summary**

6.26 The work presented above has assessed the suitability of 78 sites in Surrey and Sussex to accommodate a combined cycle energy centre, a renewable fuel production plant, two data centres and additional employment opportunities.

6.27 The sites were selected due to their status as being considered suitable for waste facilities by the relevant authorities. Further analysis in terms of their ability to provide the quantum of land required to deliver the proposed development (8ha) and whether they would be suitable to accommodate exemplar, market leading data centres.

6.28 Having undertaken the 3-stage assessment, Lambs Business Park remains the only opportunity in which to accommodate the proposed development. It is therefore considered that Lambs Business Park provides a unique opportunity within Surrey and Sussex to accommodate both land uses. If must therefore be seen as being a sub-regionally significant site.
7 Conclusions

7.1 This report has been prepared on behalf of WT Lamb, in support of the development plan promotion of land at Lambs Business Park.

7.2 The site has been intensively used for industrial and manufacturing purposes for over 100 years, but more recently the demand for the traditional building materials produced within it has waned. The eastern part of the site is used as a business park and is allocated as a Strategic Employment Site in the existing Development Plan. There is a distinct difference in the quality and age of the commercial units, with units to the north and west of the business park being associated with the former brickworks, whilst units to the east and south are more modern and meet commercial demand for such space. The former brickwork buildings do not satisfy EPC standards and cannot viably be refurbished to the required standards. By April 2023 they will therefore be vacant and redundant and will need to be redeveloped.

7.3 The western area of the site lies outside of the Strategic Employment Site designation and was historically used as a quarry. The site is currently receiving material for the purposes of aggregate recycling and inert waste recovery. The deadline for the complete restoration of the site is 2047. Both elements of the site fall within the Metropolitan Green Belt.

7.4 WT Lamb’s ambition for the site is to redevelop it to provide a combined cycle energy centre, a renewable biofuel production plant, two data centres and additional employment opportunities. The renewable biofuel production plant will handle pre-sorted and pre-bundled RDF waste, transported to the site via the railway, utilising the site’s privately-owned railway siding.

7.5 WT Lamb have actively participated in various consultations to both the emerging Tandridge Local Plan and the emerging Surrey County Council Waste Local Plan. The representations submitted to both processes have focused on the need for the proposed development and that the exceptional circumstances exist for the site to be removed from the Metropolitan Green Belt. The purpose of this report is to outline the exceptional circumstances that exist to warrant the site’s removal from the Metropolitan Green Belt.

7.6 Summarily, the exceptional circumstances that exist are:

National Planning Policy

7.7 The proposals have been framed to ensure that there is a strong alignment with national planning policy, as follows:

Economic Development

- There is a significant need for employment land within the District;
- There are areas of the site which are underutilised and undeveloped. In addition, there are buildings which by 2023 will be vacant and redundant. The site’s removal from the Metropolitan Green Belt would allow for its intensification. This in turn would allow it to make a full contribution to assist meet the Council’s forecast employment land needs over the Plan period;
- The redevelopment of the site will meet a strong commercial demand for employment space;
As evidenced in the accompanying work by Hardisty Jones Associates, the proposals will help meet the economic vision and strategy for the area at various geographic levels;

The proposals will have a strong economic impact, both directly and indirectly at the local authority and County level;

It will provide essential infrastructure to support the high technology sectors;

Climate Change

- The renewable biofuel production plant will recycle waste into pellets that can be combusted or gasified off-site to produce renewable, low carbon energy;
- The gas fired combined cycle energy centre will produce heat and power in a highly efficient, low carbon manner;
- It will place the producers of energy and heat in close proximity with large consumers of both energy and heat, ensuring that the scheme will be highly efficient;
- The low-grade residual heat from the combined cycle energy centre will be used to improve the energy efficiency of the data centres and in the drying process within the renewable biofuel production plant;
- Any residual heat could be used in existing and planned development in Lambs Business Park or the surrounding area;
- The redevelopment of the site in the manner proposed will reduce vehicle trips, thereby reducing greenhouse gas emissions;

Waste

- The scheme responds to the significant need for new waste facilities within Surrey;
- RDF Waste processed within the renewable biofuel production plant will be handled at its highest possible location within the Waste Hierarchy (recycling). Without such a facility, the highest point that this waste would ordinarily be handled would be either at the recovery or landfill levels;
- It will ensure that the RDF waste is handled in accordance with the Proximity Principle;

Sustainable Transport

- The pre-sorted and pre-bundled RDF waste will be transported to the site via the railway. This could reduce the quantum of vehicle trips on the highways network associated with moving waste by a minimum of 14,000 – 15,000 trips per annum;
- The proposals will see a reduction in the number of transport movements within Lambs Business Park when compared to the existing situation and the number of movements permitted through existing planning permissions;
- The data centres will provide cloud based I.T. facilities, meaning that data and applications can be accessed from any location. This could produce more sustainable travel patterns as individuals will not need to travel to work to access services and facilities;

Green Belt

- Work by the Local Planning Authority and LRM Planning has indicated that the site would not compromise the open character of the Metropolitan Green Belt and its removal from
the designation would not harm the fundamental purpose of the designation, or its five purposes;

- More recent work by the Local Planning Authority has confirmed that the exceptional circumstances exist for the site to be inset and removed from the Metropolitan Green Belt. This conclusion mirrors the conclusions presented in this Report;

Core Planning Principles

- WT Lamb are committed to working with the relevant planning authorities and key stakeholders through the development plan process;
- It will yield multiple benefits which will enhance and improve Lambs Business Park;
- As evidenced in the Hardisty Jones Associates report, the proposals will assist in driving sustainable economic development, both directly and indirectly;
- It will be designed to the highest possible standards;
- Technical work undertaken by Arup and Sol Environment ensures that the proposals have been framed having regard to the character and role of the site and its surroundings;
- The highly efficient combined cycle energy centre and the renewable biofuel production plant will assist in supporting the transition to a low carbon future, through the production of renewable electricity and heat;
- The scheme preserves and enhances the natural and historic environment (please refer to Arup’s technical work);
- Through the use of the railway line, the proposals make the fullest possible use of sustainable modes of transport;

Need

- The full objectively assessed need for housing and commercial space cannot be met without development on land that currently is located within the Metropolitan Green Belt;
- There is a need for the waste planning authority to identify new waste management facilities in Surrey, large enough to handle 1,621,000 tonnes of LACW and C and I waste per year;
- Evidence provided by CBRE identifies a significant demand for data centres in the UK and in the wider London market, which includes Surrey and Tandridge; and
- The data centres, the renewable fuel production plant and the combined cycle energy centre are mutually dependent upon each other. The co-location ensures that the efficiency, viability and power availability provide more benefits than the piecemeal development of each use;

Comparative Assessment

- Lambs Business Park is the only site within Surrey and Sussex that is capable of delivering the proposed development comprehensively.

7.8 For the reasons outlined above, the exceptional circumstances therefore exist for Lambs Business Park to be removed from the Metropolitan Green Belt and allocated to provide a
combined cycle energy centre, a renewable biofuel production plant, two data centres and additional employment opportunities.

LRM Planning
August 2019
Dear Colin

UNITS A-E, LAMBS BUSINESS PARK, TERRACOTTA ROAD, SOUTH GODSTONE

Further to your email of 3rd September 2018, I have now had the opportunity of re-inspecting the above premises and set out my thoughts and recommendations for these units.

Background

I have actively been marketing units at Lambs Business Park for the last 15 years, having let a number of the units on behalf of WT Lamb Holdings. I specialise in the logistics and industrial market across the South East M25 region, for the last three years working for Altus Group out of their Reigate office. I am currently marketing units from Brixton in South London down to Burgess Hill in Sussex and around the M25 from Frimley and eastwards over to Edenbridge.

Units A-E

You are familiar with the properties but they comprise older style brick built buildings under asbestos roofs which have been broken up into a number of smaller units based over ground and first floor. The units are original buildings connected with the historic use of the site as a brickworks and are what can be described as dated in their layout, construction and configuration.
The current configuration of the units is old and dated, today’s occupier in our experience preferring units which offer the following specification:

- Steel portal frame construction
- Panelled roller shutter door
- Eaves height of 5m
- Good access for loading and unloading
- 3 phase power
- Gas supply
- On-site car parking
- 10-15% office content

The current configuration of Units A-E does not offer this.

**Future Marketing**

As set out above, the specification of these units in our opinion does not meet today’s required standards and whilst this may be reflected in potential price, the cost of refurbishing these buildings to make them wind and watertight, and remove asbestos does not improve the fundamental basics of the buildings’ current configuration and layout.

**Expected Rental Values**

Redeveloping these units to provide modern bespoke units, I would anticipate being able to achieve a rental level in the order of £15 to £18 per sq ft per annum exclusive, subject to size and configuration. The location towards the back of the Estate is not ideal and the overarching hours of use restrictions have, as we are aware, hindered some occupiers’ eagerness to take small units on.

If refurbished, I would anticipate rental levels under £8.50 per sq ft being achieved. Likely refurbishment costs would be close to £50 per sq ft and therefore much such a project unviable.
Your EPC assessor has provided confirmation that all of these units currently do not have an Energy Performance Certificate rating above G and I set out in the table below, the ratings that with refurbishment works being undertaken including installation of LED lighting as well as an Air Source heat pump.

<table>
<thead>
<tr>
<th>Unit</th>
<th>EPC Rating with LED Lighting</th>
<th>EPC Rating with LED Lighting &amp; Air Source Heat Pump</th>
</tr>
</thead>
<tbody>
<tr>
<td>Unit A</td>
<td>G173</td>
<td>F129</td>
</tr>
<tr>
<td>Unit B1/B2</td>
<td>G178</td>
<td>G151</td>
</tr>
<tr>
<td>Unit C</td>
<td>G343</td>
<td>G229</td>
</tr>
<tr>
<td>Unit D</td>
<td>G156</td>
<td>E118</td>
</tr>
<tr>
<td>Motor Room</td>
<td>G358</td>
<td>G220</td>
</tr>
</tbody>
</table>

(see attached letter for information)

As is clearly evident from the above table, only one unit will have a satisfactory EPC to be close to the bottom of the acceptable levels. We are finding occupiers more aware of EPC ratings as potentially low ratings would potentially make assignment or sub-letting of space unattractive should EPC requirement levels change.

The conclusion is that it would not be cost effective in terms of the rental return to spend huge capital on upgrading these buildings to improve their EPC rating to enable us to let these commercially. The likely lease length achievable, given the units’ configuration and likely EPC rating, would make refurbishment unrealistic. These buildings are now, in our opinion, at the end of their economic life and would be more suitable to demolition and redevelopment subject to the necessary consents being obtained.

Yours sincerely

Robert Bradley-Smith BSc (Hons) MRICS
Senior Director
Altus Expert Services
robert.bradley-smith@altusgroup.com
Thursday, 6 September 2018

RE: Lambs Business Park

Dear Mr Rayner,

Further to our original site inspections and further extensive simulations on the properties, please find the results below on minimum improvements.

The conclusion I can reach is that it is not economically viable to improve these properties without major reconstruction. I have applied LED lighting and replacing the heating systems with air source heat pumps and on only one occasion did this provide an “E” rating. I am sorry that I have been unable to help in this matter and I hope that this will not affect your view of our service.

I look forward to working with you again in the future.

<table>
<thead>
<tr>
<th>Improvement measures</th>
<th>LED</th>
<th>LED &amp; Air source heat pump.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Unit A</td>
<td>G173</td>
<td>F129</td>
</tr>
<tr>
<td>Unit B1/B2 &amp; E</td>
<td>G178</td>
<td>G151</td>
</tr>
<tr>
<td>Unit C</td>
<td>G343</td>
<td>G229</td>
</tr>
<tr>
<td>Unit D</td>
<td>G156</td>
<td>E118</td>
</tr>
<tr>
<td>Motor Room</td>
<td>G358</td>
<td>G220</td>
</tr>
</tbody>
</table>

Kind regards,

[Redacted]

Ori
7th March 2019

Dear Jonathan,

RE: Godstone Sidings, proposed resumption of traffics

Further to our dialogue regarding the redevelopment of your Godstone facility and the welcome resumption of rail freight traffics; I summarise below the key points of our latest discussion:

- Your site at Godstone benefits from an active connection to our network, subject to a longstanding and active connection agreement; you could effectively run trains tomorrow.

- The Tonbridge / Redhill line your site connects into is one of the three core routes through Kent linking the Channel Tunnel and London; as such it benefits from advantageous operational characteristics; namely superior loading gauge, 700+m running length and some 35 freight paths per day enshrined in the working timetable.

- Your refurbishment and reconfiguration of your internal sidings to accommodate the proposed containerised RDF trains is therefore entirely in line with the operational parameters of our network.

- Moreover, the proposed twice daily service frequency envisaged sits readily within the capacity available in this area.

- Operationally, inbound trains would route via Redhill, setting back into your site from the Down line. Outbound trains would depart via the Down line toward Tonbridge (where they may either run-round in Tonbridge West Yard to head toward London or run forward toward Kent / North Kent via Paddock Wood).

Your rail fed development aligns both with Government policy around modal shift and Network Rail’s forecasts for further rail freight traffic; we therefore welcome the resumption of rail freight traffic from Godstone.

Regards,

Yours sincerely

Guy A G Bates
Head of Freight Development
Dear Mr Rayner,

Connection contract between Network Rail Infrastructure Limited dated 22nd September 1998, as novated to W.T. Lamb Holdings on 9th July 2008 at Godstone sidings - Lambs Business Park, Terracotta Road, Tilburstow Hill Road, South Godstone, RH9 8LJ.

This letter is to confirm that the main line rail connection - which consists of tracks, points and signalling with supporting structures - according to the agreement between Network Rail Infrastructure Ltd and WT Lamb Holdings Ltd, is currently maintained and live in order to support rail traffic to and from the Godstone Sidings in Surrey.

The availability of any future traffic to the internal siding on Lambs site, will be subject to WT Lamb Holdings internal siding being restored and maintained to an agreeable by Network Rail and sufficient level for a freight handling operator to warrant its use and adopt it.

Please do not hesitate to contact me if you wish to discuss further any aspect of the above.

Yours sincerely

Malgorzata Sztandera
Freight Connections Manager
### Surrey Waste Plan Sites (2008)

<table>
<thead>
<tr>
<th>Site / Source</th>
<th>Location</th>
<th>Green belt / urban</th>
<th>Surrey Waste Plan Status***</th>
<th>Size (ha)</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>BP, Waterside Drive, Walton</td>
<td>Elmbridge</td>
<td>Urban</td>
<td>Table 3.1</td>
<td>c.1.5</td>
<td>Site too small to meet requirements</td>
</tr>
<tr>
<td>Nonsuch Business Park, Kiln Lane, Ewell</td>
<td>Epsom &amp; Ewell</td>
<td>Urban</td>
<td>Table 3.1</td>
<td>c.9</td>
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<tr>
<td>Woodbridge Park Industrial Estate, Guildford</td>
<td>Guildford</td>
<td>Urban</td>
<td>Table 3.1</td>
<td>6.89</td>
<td>Site too small to meet requirements. Reassessed in emerging Plan (see below).</td>
</tr>
<tr>
<td>Middleton Industrial Estate, Guildford</td>
<td>Guildford</td>
<td>Urban</td>
<td>Table 3.1</td>
<td>2.53</td>
<td>Site too small to meet requirements</td>
</tr>
<tr>
<td>Cathedral Hill Estate, Guildford Mill Lane Works, Old Portsmouth Road, Peasmarsh</td>
<td>Guildford</td>
<td>Urban</td>
<td>Table 3.1</td>
<td>8</td>
<td>Carried forward to Stage 2 filter</td>
</tr>
<tr>
<td>Riverway Estate, Peasmarsh</td>
<td>Guildford</td>
<td>Urban</td>
<td>Table 3.1</td>
<td>8.02</td>
<td>Reassessed in emerging Waste Plan (see below) and considered too small.</td>
</tr>
<tr>
<td>Station Road, Ash</td>
<td>Guildford</td>
<td>Urban</td>
<td>Table 3.1</td>
<td>9.77</td>
<td>Carried forward to Stage 2 filter</td>
</tr>
<tr>
<td>Vokes Site, Normandy</td>
<td>Guildford</td>
<td>Urban</td>
<td>Table 3.1</td>
<td>6.64</td>
<td>Site too small to meet requirements</td>
</tr>
<tr>
<td>Holmethorpe Industrial Estate, Redhill</td>
<td>Reigate &amp; Banstead</td>
<td>Urban</td>
<td>Table 3.1</td>
<td>c.13</td>
<td>Carried forward to Stage 2 filter, Reassessed in emerging Waste Plan (see below).</td>
</tr>
<tr>
<td>Wells Place Industrial Estate, Redhill</td>
<td>Reigate &amp; Banstead</td>
<td>Urban</td>
<td>Table 3.1</td>
<td>c.6</td>
<td>Site too small to meet requirements</td>
</tr>
<tr>
<td>Thorpe Industrial Estate, Crabtree Road, Thorpe</td>
<td>Runnymead</td>
<td>Urban</td>
<td>Table 3.1</td>
<td>17.1</td>
<td>Carried forward to Stage 2 filter, Reassessed in emerging Waste Plan (see below).</td>
</tr>
<tr>
<td>Northumberland Place Trading Estate, Stanwell</td>
<td>Spelthorne</td>
<td>Urban</td>
<td>Table 3.1</td>
<td>c.10</td>
<td>Carried forward to Stage 2 filter</td>
</tr>
<tr>
<td>Location</td>
<td>Authority</td>
<td>Type</td>
<td>Table</td>
<td>Area</td>
<td>Notes</td>
</tr>
<tr>
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<td>---------------</td>
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<td>----------------------------------------------------------------------</td>
</tr>
<tr>
<td>Littleton Lane, Shepperton</td>
<td>Spelthorne</td>
<td>Urban</td>
<td>Table 3.1</td>
<td>c.4</td>
<td>Site too small to meet requirements</td>
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<tr>
<td>Yorktown Industrial Estate</td>
<td>Surrey Heath</td>
<td>Urban</td>
<td>Table 3.1</td>
<td>37</td>
<td>Carried forward to Stage 2 filter. Reassessed in emerging Waste Plan (see below)</td>
</tr>
<tr>
<td>Admiralty Way Trading Estate, Camberley</td>
<td>Surrey Heath</td>
<td>Urban</td>
<td>Table 3.1</td>
<td>5.4</td>
<td>Site too small to meet requirements</td>
</tr>
<tr>
<td>Hobbs Industrial Estate, Newchapel</td>
<td>Tandridge</td>
<td>Green Belt</td>
<td>Table 3.1</td>
<td>21.8</td>
<td>Carried forward to Stage 2 filter. Reassessed in emerging Waste Plan (see below)</td>
</tr>
<tr>
<td>Farnham Trading Estate, Water Lane, Farnham</td>
<td>Waverley</td>
<td>Urban</td>
<td>Table 3.1</td>
<td>9.7</td>
<td>Carried forward to Stage 2 filter. Reassessed in emerging Waste Plan (see below)</td>
</tr>
<tr>
<td>Bourne Mill Trading Estate, Farnham</td>
<td>Waverley</td>
<td>Urban</td>
<td>Table 3.1</td>
<td>1.3</td>
<td>Site too small to meet requirements</td>
</tr>
<tr>
<td>Cranleigh Trading Estate, Cranleigh</td>
<td>Waverley</td>
<td>Urban</td>
<td>Table 3.1</td>
<td>3</td>
<td>Site too small to meet requirements</td>
</tr>
<tr>
<td>Coxbridge Sandpit, Farnham</td>
<td>Waverley</td>
<td>Urban</td>
<td>Table 3.1</td>
<td>8.7</td>
<td>Carried forward to Stage 2 filter</td>
</tr>
<tr>
<td>Wintersells Industrial Estate, Byfleet</td>
<td>Woking</td>
<td>Urban</td>
<td>Table 3.1</td>
<td>c.4</td>
<td>Reassessed in emerging Waste Plan (see below) as part of a larger site.</td>
</tr>
<tr>
<td>Avro Way, Brooklands Trading Estate, Byfleet</td>
<td>Woking/Elmbridge</td>
<td>Urban</td>
<td>Table 3.1</td>
<td>12</td>
<td>Carried forward to Stage 2 filter. Reassessed in emerging Waste Plan (see below) as part of a larger site.</td>
</tr>
<tr>
<td>Byfleet Industrial Estate, Oyster Lane, Byfleet</td>
<td>Woking</td>
<td>Urban</td>
<td>Table 3.1</td>
<td>12.45</td>
<td>Carried forward to Stage 2 filter. Reassessed in emerging Waste Plan (see below) as part of a larger site.</td>
</tr>
<tr>
<td>Monument Bridge East Industrial Estate, Woking</td>
<td>Woking</td>
<td>Urban</td>
<td>Table 3.1</td>
<td>7.91</td>
<td>Carried forward to Stage 2 filter. Reassessed in emerging Waste Plan.</td>
</tr>
<tr>
<td>Goldsworth Park Industrial Estate, Woking</td>
<td>Woking</td>
<td>Urban</td>
<td>Table 3.1</td>
<td>8.27</td>
<td>Carried forward to Stage 2 filter</td>
</tr>
<tr>
<td>Sheerwater Industrial Estate, Woking</td>
<td>Woking</td>
<td>Urban</td>
<td>Table 3.1</td>
<td>6.13</td>
<td>Site too small to meet requirements</td>
</tr>
</tbody>
</table>

**Surrey Waste Plan Allocations**

<table>
<thead>
<tr>
<th>Location</th>
<th>Authority</th>
<th>Type</th>
<th>Policy</th>
<th>Area</th>
<th>Notes</th>
</tr>
</thead>
<tbody>
<tr>
<td>Petworth Road, Witley</td>
<td>Waverley</td>
<td>Green Belt</td>
<td>WD1</td>
<td>0.45</td>
<td>Site too small to meet requirements</td>
</tr>
<tr>
<td>Location</td>
<td>Catchment</td>
<td>Policy</td>
<td>Area (ha)</td>
<td>Notes</td>
<td></td>
</tr>
<tr>
<td>---------------------------------------------------</td>
<td>-----------------</td>
<td>---------</td>
<td>-----------</td>
<td>----------------------------------------------------------------------</td>
<td></td>
</tr>
<tr>
<td>Slyfield Industrial Estate: Land to the North East</td>
<td>Guildford</td>
<td>Countryside</td>
<td>Policy WD2</td>
<td>11.5 (likely net area of 7.5) Carried forward to Stage 2 filter. Reassessed in emerging Waste Plan (see below).</td>
<td></td>
</tr>
<tr>
<td>Charlton Lane, Shepperton</td>
<td>Spelthorne</td>
<td>Green Belt</td>
<td>Policy WD1, WD2, WD5</td>
<td>Site too small to meet requirements</td>
<td></td>
</tr>
<tr>
<td>Copyhold Works, Redhill</td>
<td>Tandridge</td>
<td>Green Belt</td>
<td>Policy WD2</td>
<td>Site too small to meet requirements</td>
<td></td>
</tr>
<tr>
<td>Heather Farm, Horshell</td>
<td></td>
<td>Green Belt</td>
<td>Policy WD2</td>
<td>Site too small to meet requirements</td>
<td></td>
</tr>
<tr>
<td>Land at Earlswood Depot and Sewage Treatment Works</td>
<td>Reigate &amp; Banstead</td>
<td>Green Belt</td>
<td>Policy WD1, WD2</td>
<td>Site too small to meet requirements.</td>
<td></td>
</tr>
<tr>
<td>Martyrs Lane, Woking</td>
<td>Woking</td>
<td>Green Belt</td>
<td>Policy WD1, WD2, WD5</td>
<td>Site too small to meet requirements.</td>
<td></td>
</tr>
<tr>
<td>Land at Randalls Road, Leatherhead</td>
<td>Mole Valley</td>
<td>Green Belt</td>
<td>Policy WD1, WD2</td>
<td>Site too small to meet requirements. Reassessed in emerging Waste Plan (see below).</td>
<td></td>
</tr>
<tr>
<td>Land adjacent to Trumps Farm, Longcross</td>
<td>Runnymede</td>
<td>Green Belt</td>
<td>Policy WD2, WD5</td>
<td>Site too small to meet requirements. Reassessed in emerging Waste Plan (see below).</td>
<td></td>
</tr>
<tr>
<td>Weylands Treatment Works, Hersham</td>
<td>Elmbridge</td>
<td>Green Belt</td>
<td>Policy WD2</td>
<td>Site too small to meet requirements. Reassessed in emerging Waste Plan (see below).</td>
<td></td>
</tr>
<tr>
<td>Land at former airfield, Wisley</td>
<td>Guildford</td>
<td>Green Belt</td>
<td>Policy WD2, WD5</td>
<td>Carried forward to Stage 2 filter</td>
<td></td>
</tr>
<tr>
<td>Lyne Lane, former compost site</td>
<td>Runnymede</td>
<td>Green Belt</td>
<td>Policy WD2</td>
<td>Site too small to meet requirements.</td>
<td></td>
</tr>
<tr>
<td>Oak Leaf Farm, Horton Road, Stanwell Moor</td>
<td>Spelthorne</td>
<td>Green Belt</td>
<td>Policy WD2</td>
<td>Reassessed in emerging Waste Plan (see below).</td>
<td></td>
</tr>
<tr>
<td>Reigate Road Quarry, Betchworth</td>
<td>Mole Valley</td>
<td>Green Belt</td>
<td>Policy WD2</td>
<td>Site too small to meet requirements</td>
<td></td>
</tr>
</tbody>
</table>

*The Surrey Waste Plan indicates "C11 A list of industrial estates, which may be able to accommodate waste management facilities, is shown below, in Table 3.1; this list is not exhaustive(1). Individual plots and buildings on industrial estates and urban sites experience a high turnover – they frequently change ownership and use. It is expected that some appropriate sites will become available throughout the plan period and that the waste management industry will bring them forward for development." Identified as suitable for recycling, storage, transfer, materials recovery and processing facilities.

** The plan SWP indicates "C12 Work undertaken in the preparation of this development plan document, has identified sites that are considered appropriate for waste management facilities. These are named in Policy WD2 to contribute to regional targets and to provide a level of certainty to
communities, waste collection and disposal authorities and the waste management industry. There is considerable variation in the scope for development of these sites that is addressed through key development criteria notes, provided with the Proposals Maps.*

***

Table 3.1 Identified as suitable for recycling, storage, transfer, materials recovery and processing facilities

<table>
<thead>
<tr>
<th>Site / Source</th>
<th>Location</th>
<th>Green belt / urban</th>
<th>Size (ha)</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Industrial Land Areas of Search</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Brooklands Industrial Park, Wintersells Road Industrial Park and Byfleet Industrial Estate</td>
<td>Elmbridge and Woking</td>
<td>Urban</td>
<td>49.3</td>
<td>Carried forward for Stage 2 assessment.</td>
</tr>
<tr>
<td>Molesley Industrial Estate</td>
<td>Elmbridge</td>
<td>Urban</td>
<td>15</td>
<td>Carried forward for Stage 2 assessment.</td>
</tr>
<tr>
<td>Hersham Road North</td>
<td>Elmbridge</td>
<td>Urban</td>
<td>7.2</td>
<td>Site too small to meet requirements.</td>
</tr>
<tr>
<td>Longmead Industrial Estate</td>
<td>Epsom &amp; Ewell</td>
<td>Urban</td>
<td>14</td>
<td>Carried forward for Stage 2 assessment.</td>
</tr>
<tr>
<td>Slyfield Industrial Estate</td>
<td>Guildford</td>
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<td>39</td>
<td>Carried forward for Stage 2 assessment.</td>
</tr>
<tr>
<td>Woodbridge Meadows Industrial Estate</td>
<td>Guildford</td>
<td>Urban</td>
<td>8.7</td>
<td>Carried forward for Stage 2 assessment.</td>
</tr>
<tr>
<td>Land at Burnt Common Warehouse</td>
<td>Guildford</td>
<td>Greenfield</td>
<td>9.3</td>
<td>Carried forward for Stage 2 assessment.</td>
</tr>
<tr>
<td>North and South of Lysons Avenue</td>
<td>Guildford</td>
<td>Urban</td>
<td>7.0</td>
<td>Site too small to meet requirements.</td>
</tr>
<tr>
<td>Riverway Industrial Estate, Astolat Business Park and Weyvern Park at Peasmarsh</td>
<td>Guildford</td>
<td>Major Developed Site in the Green Belt</td>
<td>7.0</td>
<td>Site too small to meet requirements.</td>
</tr>
<tr>
<td>Land near Dorking West Station</td>
<td>Mole Valley</td>
<td>Urban</td>
<td>8.6</td>
<td>Carried forward for Stage 2 assessment.</td>
</tr>
<tr>
<td>Holmetherpe Industrial Estate, Redhill</td>
<td>Reigate and Banstead</td>
<td>Urban</td>
<td>18</td>
<td>Carried forward for Stage 2 assessment.</td>
</tr>
<tr>
<td>Perrywood Business Park</td>
<td>Reigate and Banstead</td>
<td>Urban</td>
<td>6.9</td>
<td>Site too small to meet requirements.</td>
</tr>
<tr>
<td>Salfords Industrial Estate</td>
<td>Reigate and Banstead</td>
<td>Urban</td>
<td>22</td>
<td>Carried forward for Stage 2 assessment.</td>
</tr>
<tr>
<td>Thorpe Industrial Estate</td>
<td>Runnymede</td>
<td>Urban</td>
<td>18</td>
<td>Carried forward for Stage 2 assessment.</td>
</tr>
<tr>
<td>Location</td>
<td>Authority</td>
<td>Category</td>
<td>Size (ha)</td>
<td>Notes</td>
</tr>
<tr>
<td>-------------------------------------------------------------------------</td>
<td>-----------------</td>
<td>---------------------</td>
<td>-----------</td>
<td>-------------------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>Byfleet Road Employment Allocation</td>
<td>Runnymede</td>
<td>Greenfield</td>
<td>7.9</td>
<td>Site too small to meet requirements.</td>
</tr>
<tr>
<td>Yorktown Industrial Estate</td>
<td>Surrey Heath</td>
<td>Urban</td>
<td>30</td>
<td>Carried forward for Stage 2 assessment.</td>
</tr>
<tr>
<td>Windmill Road Industrial Area</td>
<td>Spelthorne</td>
<td>Urban</td>
<td>12.2</td>
<td>Carried forward for Stage 2 assessment.</td>
</tr>
<tr>
<td>Hobbs Industrial Estate</td>
<td>Tandridge</td>
<td>Green Belt</td>
<td>18.2</td>
<td>Carried forward for Stage 2 assessment.</td>
</tr>
<tr>
<td>Farnham Trading Estate</td>
<td>Waverley</td>
<td>Urban and Undeveloped Land</td>
<td>16.2</td>
<td>Carried forward for Stage 2 assessment.</td>
</tr>
<tr>
<td>Dunsfold Park</td>
<td>Waverley</td>
<td>Allocated as part of new settlement</td>
<td>28</td>
<td>Carried forward for Stage 2 assessment.</td>
</tr>
<tr>
<td>Coxbridge Business Park</td>
<td>Waverley</td>
<td>Urban</td>
<td>7.7</td>
<td>Site too small to meet requirements.</td>
</tr>
<tr>
<td>Monument Way East Industrial Estate</td>
<td>Woking</td>
<td>Urban</td>
<td>8.0</td>
<td>Carried forward for Stage 2 assessment.</td>
</tr>
<tr>
<td><strong>Allocated Sites</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Former Weylands Treatment Works</td>
<td>Elmbridge</td>
<td>Green Belt</td>
<td>5.6</td>
<td>Site was considered as a 2008 Waste Plan site. Remains too small to meet requirements.</td>
</tr>
<tr>
<td>Land to the North East of Slyfield Industrial Estate</td>
<td>Guildford</td>
<td>Small portion of the is within the Green Belt</td>
<td>12.7</td>
<td>Site was considered as a 2008 Waste Plan site. As previously, the site is carried forward to Stage 2 filter.</td>
</tr>
<tr>
<td>Land in and adjoining Leatherhead Sewage Treatment Works, Randalls Road</td>
<td>Mole Valley</td>
<td>Green Belt</td>
<td>3.4</td>
<td>Site was considered as a 2008 Waste Plan site. The site is smaller than previously promoted. Remains too small to meet requirements.</td>
</tr>
<tr>
<td>Land adjacent to Trumps Farm, Longcross</td>
<td>Runnymede</td>
<td>Green Belt</td>
<td>6.2</td>
<td>Site was considered as a 2008 Waste Plan site. The site is smaller than previously promoted. Remains too small to meet requirements.</td>
</tr>
<tr>
<td>Oakleaf Farm, Stanwell Moor</td>
<td>Spelthorne</td>
<td>Green Belt</td>
<td>6.8</td>
<td>Site was considered as a 2008 Waste Plan site. The site is smaller than previously promoted and is now too small to meet requirements. Removed from Stage 2 assessment.</td>
</tr>
<tr>
<td>Lambs Business Park</td>
<td>Tandridge</td>
<td>Green Belt</td>
<td>3</td>
<td>Site was not considered as a 2008 Waste Plan site. The site is smaller than previously promoted, but this underplays the size of the site. The Tandridge Plan identifies the site as being 12.8ha, but this does not reflect the site’s entire extent. Carried forward for Stage 2 assessment.</td>
</tr>
</tbody>
</table>
### West Sussex Local Plan

<table>
<thead>
<tr>
<th>Site / Source</th>
<th>Location</th>
<th>Size</th>
<th>Notes</th>
</tr>
</thead>
<tbody>
<tr>
<td>Shoreham Harbour</td>
<td>Adur District</td>
<td>3.25</td>
<td>Site too small to meet requirements</td>
</tr>
<tr>
<td>Slindon Bottom</td>
<td>Arun District</td>
<td>9</td>
<td>Not considered suitable by WSCC</td>
</tr>
<tr>
<td>Site adj to Sewage Works, Ford</td>
<td>Arun District</td>
<td>1.7</td>
<td>Site too small to meet requirements</td>
</tr>
<tr>
<td>Ford Airfield</td>
<td>Arun District</td>
<td>5.5</td>
<td>Site too small to meet requirements</td>
</tr>
<tr>
<td>Hobbs Barn</td>
<td>Arun District</td>
<td>2.7</td>
<td>Site too small to meet requirements</td>
</tr>
<tr>
<td>Blue Prince Mushroom Site</td>
<td>Arun District</td>
<td>5.6</td>
<td>Site too small to meet requirements</td>
</tr>
<tr>
<td>Land South of Strettington Flyover</td>
<td>Chichester</td>
<td>1.37</td>
<td>Site too small to meet requirements</td>
</tr>
<tr>
<td>Portfield</td>
<td>Chichester</td>
<td>11.49</td>
<td>Not considered suitable by WSCC</td>
</tr>
<tr>
<td>Fuel Depot, Bognor Road</td>
<td>Chichester</td>
<td>5.2</td>
<td>Site too small to meet requirements</td>
</tr>
<tr>
<td>Pendean Sandpit</td>
<td>Chichester</td>
<td>27</td>
<td>Not considered suitable by WSCC</td>
</tr>
<tr>
<td>Boxgrove Gravel Pit</td>
<td>Chichester</td>
<td>16</td>
<td>Not considered suitable by WSCC</td>
</tr>
<tr>
<td>Land east of Tangmere Airfield</td>
<td>Chichester</td>
<td>26.6</td>
<td>Not considered suitable by WSCC</td>
</tr>
<tr>
<td>South East Corner of Tangmere Airfield</td>
<td>Chichester</td>
<td>4.88</td>
<td>Site too small to meet requirements</td>
</tr>
<tr>
<td>Woodhorn Farm</td>
<td>Chichester</td>
<td>2.7</td>
<td>Site too small to meet requirements</td>
</tr>
<tr>
<td>Bognor Quarry Common</td>
<td>Chichester</td>
<td>29.06</td>
<td>Not considered suitable by WSCC</td>
</tr>
<tr>
<td>Duncton Quarry</td>
<td>Chichester</td>
<td>6.75</td>
<td>Site too small to meet requirements</td>
</tr>
<tr>
<td>Old Lime Works</td>
<td>Chichester</td>
<td>3.17</td>
<td>Site too small to meet requirements</td>
</tr>
<tr>
<td>Cockling Chalkpit</td>
<td>Chichester</td>
<td>4.9</td>
<td>Site too small to meet requirements</td>
</tr>
<tr>
<td>Shoreham Cement Works</td>
<td>Horsham</td>
<td>19.7</td>
<td>Not considered suitable by WSCC</td>
</tr>
<tr>
<td>Nowhurst Business Centre</td>
<td>Horsham</td>
<td>6.5</td>
<td>Site too small to meet requirements</td>
</tr>
<tr>
<td>Brookhurst Wood</td>
<td>Horsham</td>
<td>42.6</td>
<td>Carried forward to Stage 2 filter</td>
</tr>
<tr>
<td>Langhurstwood Quarry</td>
<td>Horsham</td>
<td>58</td>
<td>Not considered suitable by WSCC</td>
</tr>
<tr>
<td>Laybrook Brickworks</td>
<td>Horsham</td>
<td>47.93</td>
<td>Not considered suitable by WSCC</td>
</tr>
<tr>
<td>Chantry Lane</td>
<td>Horsham</td>
<td>4.9</td>
<td>Site too small to meet requirements</td>
</tr>
<tr>
<td>Star Road Trading Estate</td>
<td>Horsham</td>
<td>4.2</td>
<td>Site too small to meet requirements</td>
</tr>
<tr>
<td>Golding Barn</td>
<td>Horsham</td>
<td>2.31</td>
<td>Site too small to meet requirements</td>
</tr>
<tr>
<td>Broadbridge Farm</td>
<td>Horsham</td>
<td>2.6</td>
<td>Site too small to meet requirements</td>
</tr>
<tr>
<td>Land at North Farm</td>
<td>Horsham</td>
<td>1.06</td>
<td>Site too small to meet requirements</td>
</tr>
<tr>
<td>Hampers Lane Industrial Estate</td>
<td>Horsham</td>
<td>3.45</td>
<td>Site too small to meet requirements</td>
</tr>
<tr>
<td>Burleigh Oaks Farm</td>
<td>Mid Sussex</td>
<td>1.13</td>
<td>Site too small to meet requirements</td>
</tr>
<tr>
<td>Freshfield Lane Brickworks</td>
<td>Mid Sussex</td>
<td>1.7</td>
<td>Site too small to meet requirements</td>
</tr>
<tr>
<td>Land rear of Ricebridge Industrial Estate</td>
<td>Mid Sussex</td>
<td>10.1</td>
<td>Not considered suitable by WSCC</td>
</tr>
<tr>
<td>Land at Hickstead</td>
<td>Mid Sussex</td>
<td>8.65</td>
<td>Not considered suitable by WSCC</td>
</tr>
<tr>
<td>Location</td>
<td>Area</td>
<td>Rating</td>
<td>Reason</td>
</tr>
<tr>
<td>----------------------------------------------</td>
<td>-------</td>
<td>--------</td>
<td>---------------------------------------------</td>
</tr>
<tr>
<td>Land adj to Sewage Works, Cuckfield</td>
<td>Mid Sussex</td>
<td>4.6</td>
<td>Site too small to meet requirements</td>
</tr>
<tr>
<td>Land adj to Goddards Green WWTW</td>
<td>Mid Sussex</td>
<td>7.98</td>
<td>Carried forward to Stage 2 filter</td>
</tr>
<tr>
<td>Newtimber Chalkpit</td>
<td>Mid Sussex</td>
<td>9.9</td>
<td>Not considered suitable by WSCC</td>
</tr>
<tr>
<td>Decoy Farm</td>
<td>Worthing</td>
<td>8.76</td>
<td>Not considered suitable by WSCC</td>
</tr>
</tbody>
</table>

*Long list of 37 sites identified by WSCC as potentially being suitable for waste. Taken from the Sussex Minerals and Waste Development Framework, Background Paper 6 Strategic Waste Sites December 2009*
<table>
<thead>
<tr>
<th>Site / Source</th>
<th>Location</th>
<th>Green belt / urban</th>
<th>Status</th>
<th>Size (ha)</th>
<th>Proximity to Rail Connection</th>
</tr>
</thead>
<tbody>
<tr>
<td>Nonsuch Business Park, Kiln Lane, Ewell</td>
<td>Epsom &amp; Ewell Urban</td>
<td>Table 3.1</td>
<td>Not short listed</td>
<td>c.9</td>
<td>The site is located immediately adjacent to the station and the railway line will be in 3rd party ownership. There is no existing railway siding.</td>
</tr>
<tr>
<td>Cathedral Hill Estate</td>
<td>Guildford Urban</td>
<td>Table 3.1</td>
<td>Not short listed</td>
<td>8</td>
<td>The site is located immediately adjacent to the North Downs Line. There is no existing railway siding.</td>
</tr>
<tr>
<td>Station Road, Ash</td>
<td>Guildford Urban</td>
<td>Table 3.1</td>
<td>Not short</td>
<td>9.77</td>
<td>The site is located immediately adjacent to the station and the railway line will be in 3rd party ownership. There is no existing railway siding.</td>
</tr>
<tr>
<td>Northumberland Close Trading Estate, Stanwell</td>
<td>Spelthorne Urban</td>
<td>Table 3.1</td>
<td>Not short listed</td>
<td>c.10</td>
<td>The site is located approximately 1km to the south of the Heathrow Line and 1.6km to the west of the Waterloo to Reading Line. As the land between the site and the railway line will be in 3rd party ownership, it is considered that a railway siding is not deliverable. It is therefore dismissed from consideration in the Stage 3 assessment.</td>
</tr>
<tr>
<td>Yorktown Industrial Estate</td>
<td>Surrey Heath Urban</td>
<td>Table 3.1</td>
<td>ILAS</td>
<td>3</td>
<td>The site is located immediately adjacent to the North Downs Line and Ascot to Guildford Line. There is no existing railway siding.</td>
</tr>
<tr>
<td>Hobbs Industrial Estate, Newchapel</td>
<td>Tandridge Major Developed Site – Green Belt</td>
<td>Table 3.1</td>
<td>ILAS</td>
<td>18.2</td>
<td>The site is located approximately 3.2km to the west of the Oxted Line and c.7km to the east of the Brighton Main Line. As the land between the site and the railway line will be in 3rd party ownership, it is considered that a railway siding is not deliverable. It is therefore dismissed from consideration in the Stage 3 assessment.</td>
</tr>
</tbody>
</table>

*Note: The Surrey Waste Plan sites for Stage 2 Filter (Rail Availability) (2008 and 2019)*
<table>
<thead>
<tr>
<th>Location</th>
<th>Policy</th>
<th>ILAS</th>
<th>Category</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>Farnham Trading Estate, Water Lane, Farnham</td>
<td>ISU</td>
<td>15</td>
<td>Undeveloped</td>
<td>Land is located immediately adjacent to the A31.</td>
</tr>
<tr>
<td>Coxbridge Sandpit, Farnham</td>
<td>ISU</td>
<td>13.4</td>
<td>Undeveloped</td>
<td>Land is located immediately adjacent to the A251.</td>
</tr>
<tr>
<td>Brooklands Industrial Park, Wintersells Road Industrial Park and Byfleet Industrial Estate, Woking</td>
<td>ISU</td>
<td>16.98</td>
<td>Undeveloped</td>
<td>Land is located approximately 3km to the north of the A251.</td>
</tr>
<tr>
<td>Monument Bridge East Industrial Estate, Woking</td>
<td>ISU</td>
<td>8</td>
<td>Undeveloped</td>
<td>Land is located approximately 1.4km to the west of the A251.</td>
</tr>
<tr>
<td>Goldsworth Park Industrial Estate, Woking</td>
<td>ISU</td>
<td>8.27</td>
<td>Undeveloped</td>
<td>Land is located approximately 1.5km to the west of the A251.</td>
</tr>
<tr>
<td>Slyfield Industrial Estate: Land to the North East of the Hampshire Trading Estate, Water Lane</td>
<td>ISU</td>
<td>12.7</td>
<td>Undeveloped</td>
<td>Land is located approximately 1.5km to the east of the A251.</td>
</tr>
<tr>
<td>Land at former airport, Wisley</td>
<td>ISU</td>
<td>16.98</td>
<td>Undeveloped</td>
<td>Land is located approximately 3.8km to the north west of the A273 and 4.5km to the south east of the A251.</td>
</tr>
<tr>
<td>Lambs Business Park, Tandridge</td>
<td>ISU</td>
<td>13.4</td>
<td>Undeveloped</td>
<td>Land is located immediately adjacent to the A273.</td>
</tr>
<tr>
<td>Molesey Industrial Estate, Weybridge</td>
<td>ISU</td>
<td>15</td>
<td>Undeveloped</td>
<td>Land is located immediately adjacent to the A251.</td>
</tr>
</tbody>
</table>

From consideration in the Stage 2 assessment:

- There is no existing railway siding.
- If a railway Line will be in future ownership, it is considered that a railway siding will be in "no party ownership" and therefore dismissed.
- The site is located approximately 3km to the west of the A31.
- The site is located approximately 3km to the north of the A31.

From consideration in the Stage 3 assessment:

- There is no existing railway siding.
- If a railway Line will be in future ownership, it is considered that a railway siding will be in "no party ownership" and therefore dismissed.
- The site is located approximately 3km to the west of the A31.
- The site is located approximately 3km to the north of the A31.
<table>
<thead>
<tr>
<th>Site</th>
<th>Policy</th>
<th>Local Plan</th>
<th>Settlement</th>
<th>Remarks</th>
</tr>
</thead>
<tbody>
<tr>
<td>Longmead Industrial Estate</td>
<td>IAS 20</td>
<td>ILAS</td>
<td>Urban</td>
<td>From consideration in the Stage 3 assessment.</td>
</tr>
<tr>
<td>Epsom &amp; Ewell Urban Local Plan Policy ILAS 14</td>
<td></td>
<td></td>
<td></td>
<td>The site is located approximately 1km to the east of the Mole Valley Line.</td>
</tr>
<tr>
<td>Site / Source</td>
<td>Location</td>
<td>Allocation</td>
<td>Size</td>
<td>Proximity to Rail Connection</td>
</tr>
<tr>
<td>--------------</td>
<td>----------</td>
<td>------------</td>
<td>------</td>
<td>-----------------------------</td>
</tr>
<tr>
<td>Brookhurst Wood</td>
<td>West Sussex</td>
<td>Horsham</td>
<td>42.6</td>
<td>7.98</td>
</tr>
<tr>
<td>The site is located immediately adjacent to the Sutton to Mole Valley line.</td>
<td>There is no existing railway siding.</td>
<td>The site is located approximately 3km to the east of the Brighton Main line.</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

West Sussex Waste Local Plan
<table>
<thead>
<tr>
<th>Site / Source</th>
<th>Accessibility by Train</th>
<th>Accessibility by Helicopter</th>
<th>Flood Zone</th>
<th>Main Power Supply</th>
<th>Fibre Optic Connections</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>Lambs Business Park</td>
<td>×</td>
<td></td>
<td>1</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Nonsuch Business Park, Kiln Lane, Ewell</td>
<td>×</td>
<td></td>
<td>1</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Cathedral Hill Estate</td>
<td>×</td>
<td></td>
<td>1</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Station Road, Ash</td>
<td>×</td>
<td></td>
<td>1</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Holmethorpe Industrial Estate, Redhill</td>
<td>×</td>
<td></td>
<td>2</td>
<td>3</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Yorktown Industrial Estate</td>
<td>×</td>
<td></td>
<td>2</td>
<td>3</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Farnham Trading Estate, Water Lane, Farnham</td>
<td>×</td>
<td></td>
<td>2</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Brooklands Industrial Park, Wintersells Road Industrial Park and Byfleet Industrial Estate</td>
<td>×</td>
<td></td>
<td>1</td>
<td>2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Monument Way East</td>
<td>×</td>
<td></td>
<td>1</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Longmead Industrial Estate, Epsom</td>
<td>×</td>
<td></td>
<td>2</td>
<td>3</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Land near Dorking West Station</td>
<td>×</td>
<td></td>
<td>1</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Site / Source</td>
<td>Accessibility by Train</td>
<td>Accessibility by Helicopter</td>
<td>Main Power Supply</td>
<td>Duel Power Sources</td>
<td>Fiber Optic Connections</td>
<td>comments</td>
</tr>
<tr>
<td>---------------</td>
<td>------------------------</td>
<td>----------------------------</td>
<td>-------------------</td>
<td>-------------------</td>
<td>-------------------------</td>
<td>----------</td>
</tr>
<tr>
<td>Woodbridge Meadows Industrial Estate</td>
<td>x</td>
<td>x</td>
<td>x</td>
<td>x</td>
<td>x</td>
<td>The site is too distant from these locations</td>
</tr>
<tr>
<td>Brookhurst Wood</td>
<td>x</td>
<td>x</td>
<td>x</td>
<td>x</td>
<td>x</td>
<td>The site is not accessible by train and is too distant from the main roads.</td>
</tr>
<tr>
<td>The western part is in Flood Zone 1, but the central and eastern parts are in Flood Zone 2 and 3.</td>
<td>x</td>
<td>x</td>
<td>x</td>
<td>x</td>
<td>x</td>
<td>Multiple points of access and can be seen from main roads. Located in Flood Zone 2 and 3.</td>
</tr>
</tbody>
</table>
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Key:
- Landholding TA80/675
- TA99/155 Section 106 phased restoration

Landholding: TA80/675
TA99/155
Section 106 phased restoration

REVISION DATE
DESCRIPTION

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PROJECT GODSTONE QUARRY

DRAWN BY MPB

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CHECKED BY

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