Witness Statement Relating to Matter No 4 and 4.6 of Tandridge Local Plan Enquiry

Local Plan Enquiry Witness Statement – A Middleton  23/7/2019

Shelton Close Sports Ground Warlingham – site policy HSG 18

Representation :

The HSG 18 site policy is unsound, as it does not include the specific mitigation requirements detailed within the Tandridge site specific Green Belt Assessment Part 3, thereby constituting a challengeable response to ensuring appropriate mitigation measures are secured through policy, in order to release green belt land for development. The site capacity assessment is also inconsistent with the Council’s own ecological assessment, by 10 units.

My representation seeks to change the plan and to request that the HSG 18 site policy is amended to include the specific references detailed as 1) to 5) below.

This statement should be read in conjunction with the attached representation which was made by A Middleton, seeking to change the Tandridge Local Plan and assert that without such changes the plan is unsound.

The original ecological and capacity survey for the site in 2015 states that the site is only suitable for 100 residential units. The Green Belt Assessment states that it is suitable for 110 units. The final submitted version of the plan states 110 units and this is a mismatch. No justification of the additional 10 units is given in any submission documents.

The site specific policy for site Ref HSG 18, is unsound as currently drafted, in that it does not reflect the findings and recommended requirements, detailed within the Council’s own green belt assessment (GBA) Part3. These requirements arise from the Council’s own ecological survey, undertaken by the Environment Partnership in 2015. To make the site policy sound, it should include specific reference to statements made within the GBA Part 3, which are listed below as suggested additions to the policy :

Requested additions to policy HSG 18

1) Development would need to be located in ecologically suitable areas (Areas A, C & D, marked on map within Tandridge site ecological survey).
2) Area B is not suitable for development and contains deciduous woodland, with possibly some ancient components. A 15m buffer zone is required from the tree canopy edge of this area.
3) Loss of area C would need to be offset through habitat creation within the buffer zone.
4) Existing trees and dense boundary vegetation in area B should be retained.
5) Site capacity to be amended to 100 units.

The policy as currently drafted is therefore not reflective of the requirements for proper mitigation of development impact.

Without the above specific policy requirements being included, the weak policy renders the plan unsound and not proportionate to the impact of green belt loss. The mitigation aspects to support exceptional circumstances being declared are open to interpretation and challenge by developers through the development control process and could well be undermined. By establishing them in policy will ensure proper mitigation of development impact.

End.  Attached :  Council’s site Ecological Survey, incl Map.