Representations on behalf of
Godstone Parish Council

This Examination Paper should be read in conjunction with Godstone PC’s Regulation 19 representations in respect of Chapter 14 of the submission Local Plan

**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?**

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<th>4.1 Was the Green Belt Assessment undertaken on the basis of a clear methodology consistent with national planning policy for protecting Green Belts?</th>
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| **No.** The Council correctly explains that the Green Belt is a national planning policy constraint of great significance. It also explains that 94% of its administrative area is within the Green Belt (GB). Through a series of documents (GB1 – GB15) the Council has attempted to apply its Green Belt Assessment Methodology (having started with GB14 and 15) using the five purposes of a GB (Framework paragraph 80). It has never embraced the concept that the GB has a wider significance than its own district and has made no attempt to consider the wider issue of GB policy.

The PC’s position remains as set out in the Regulation 19 Representations that:

- The GB Assessment (GB1) is unsound and flawed and does not provide the exceptional circumstances as to why a major release of land from the Green Belt.

- GB1 was based on an inadequate SA (SSHA2) and no full analysis of the alternative options to accommodate development.

- The planning authority’s justification is inadequately explained and reasoned and cannot be modified to make the Plan and its strategy sound.

- The planning authority’s exceptional circumstances for releasing the broad location for SGGC are inadequate and fail to have regard to the three dimensions to sustainable development and the three planning roles - economic, social and environmental.
Thus, one of the failings of the GB Assessment (GB1 - 15) was to confine assessment to the administrative area of Tandridge and yet the GB in Tandridge is part of the wider metropolitan GB around London. For example, at the time documents GB14 and 15 were prepared (2014) it was known that the adjacent local authority, Reigate and Banstead, was looking to land east of Redhill and Merstham as potential urban extensions and this was confirmed in its adopted Core Strategy (July 2014). That Council’s subsequent Regulation 19 Development Management Plan at policy MLS2 proposed safeguarding land at Redhill Aerodrome, abutting the boundary with Tandridge District, for future development as a stand-alone settlement based on garden village principles to provide for development needs post 2027. At that time (2015 – 2108) the opportunity for the two Council’s to work collaboratively at Redhill Aerodrome was not taken up by Tandridge.

Neither was any attempt made by the Council to consider and work collaboratively with other adjoining authorities on urban extensions in the north of the district and elsewhere given the scale of housing need those authorities faced. The methodology adopted made no sense in the context of considering the wider GB issue that is not confined to the administrative area of Tandridge Council.

It is also apparent from the later GB Assessments (GB4 and GB6) that the wider significance of the metropolitan GB was ignored with the focus being to ‘consider all GB land in Tandridge’ and ‘assesses land designated as GB in Tandridge’.

The adopted methodology of only looking at the GB in Tandridge missed the opportunity provided in paragraph 84 of the Framework for:

> 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.

The failure to work collaboratively with adjacent authorities on the common issue of GB boundaries to accommodate housing need represents a missed opportunity. That opportunity would channel development towards an urban area or areas where sustainable patterns of development already exist and can be augmented through extensions and the land take from the GB for a GC could be reduced.
Section 4 of the exceptional circumstances case (GB1) deals with the case for Garden Communities. It is this section, in particular, that is partial and thus unsound. There appears to have been an uncritical assumption that housing need justifies the provision of a new settlement in the GB, with no proper recognition of the harm to the GB that would arise. This issue was very recently wrestled with in the appeal by Wisley Property Investments concerning a new settlement on land at Wisley Airfield (PINS ref: AP/Y3615/W/16/315894). A copy of the Secretary of State’s decision letter and extracts from the Inspector’s report were submitted with the PC’s Regulation 19 representations (under Chapter 11 spatial strategy).

Paragraph 4.1 of the Council’s exceptional circumstances case (GB1), explained that four locations had been considered for a Garden Community and then that was reduced to three with land west of Edenbridge having been dropped. It is then noticeable that only South Godstone and Blindley Heath were considered in paragraphs 4.10 - 4.12 and 4.21; Redhill Aerodrome was simply not considered under the headings:

*Does the Green Belt Assessment recommend that the Green Belt in this location should be retained or further considered in terms of exceptional circumstances?*

*What is the nature and extent of the harm to the Green Belt if the site is developed?*

*To what extent can the consequent impacts on the purposes of the Green Belt be ameliorated or reduced to the lowest reasonably practicable extent?*

*Discussion: Are there exceptional circumstances that would outweigh the harm to the Green Belt and justify Green Belt release?*

Section 4 is thus unsound in not considering all three sites thoroughly, consistently or uniformly. The option of planning strategically on a policy of significance across local boundaries was not taken up. This option has been part of national planning advice since at least March 2012 and is continued in the Framework 2019, having been brought forward from the Framework (2012) paragraph 178 where it was explained that:

> public bodies have a duty to cooperate on planning issues that cross administrative boundaries, particularly those which relate to the strategic priorities set out in paragraph 156. The Government expects joint working on areas of common interest to be diligently undertaken for the mutual benefit of neighbouring authorities.

There has been no diligent joint working for the reasons previously explained in the PC’s Statement on Matter 1.
In the Council’s GB Assessment (GB1 and 2) the approach was flawed and missed the crucial point in Framework paragraph 157 of co-operating with neighbouring authorities. Importantly the Council and neighbouring planning authorities to the north, west and east are constrained by the GB and a united approach to GB policy and the strategic issue of housing provision should have been a priority and not ignored.

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?

No. Part of the Council’s rationale for the release of GB land for a Garden Community is that it says it provides the opportunity for an appropriate and sustainable way to meet development needs, including homes, employment and infrastructure, for the future. It is expected that it would be a self-sustaining community (principle underpinning development in Chapter 33). It is plain that the paucity of information and definition for the SGGC and strategic policy SGC01 does not provide any certainty as to how the Garden Community would be a self-sustaining community.

As has been explained in other representations on behalf of GPC, the SGGC is an aspiration that lacks any credible means and explanation as to how it would deliver homes and jobs and fails to provide detail on the form, scale, access and quantum of development. In short it fails to have regard to the three dimensions to sustainable development and the three planning roles - economic, social and environmental. This is crucial if GB land is to be developed.

The absence of a clearly stated and justified GB exceptional circumstances case and a properly defined strategic purpose coupled with the woolliness of TDC’s approach is a fundamental flaw in the Council’s approach to considering the release of land from the GB. There is nothing in the Plan that makes provision for and ensures that sufficient provision is made for employment needs of SGGC residents. The assessment of the district’s economic needs (AECOM for TDC Tandridge Economic Needs Assessment November 2015 – ECRT9) showed that seven out of ten employed residents travelled out of the district for employment. 75% of all employed residents used the car to travel to work. That level of reliance on the private car should be considered unsustainable in the context of section 4 of the Framework.
ECRT9 was followed by Strategic Economic Assessment for the district published in November 2018 (ECRT1) after the Regulation 19 consultation had closed. ECRT1 makes a case for between 38,000 – 43,000m² of employment floor space to be provided at the SGGC. Neither the vision nor policy SGC01 (or employment policies in general) gives any direction about such a scale of development. The wooliness of the Council’s approach in leaving everything to an AAP very significantly tells against the aim of the SGGC in policy SGC01 to:

- to contribute to meeting the needs for homes, jobs and infrastructure across the District
- be a properly planned and provide high quality, mixed use development

This is a very important issue since without full and proper provision for self-sufficient employment that embraces the approach in section 4 of the Framework the SGGC will be reliant on unsustainable transport modes for future residents to get to and from work. Godstone PC feels very strongly that the Council’s approach has taken no account of the need to promote and adopt sustainable patterns of development. For the PC, there remains the fear remains that the SGGC will be a dormitory settlement reliant on the private motor car for transport and it will, in effect, be a gratuitous residential development that fails the GB purpose of safeguarding the countryside from encroachment and fails the three dimensions of the Framework to deliver sustainable development and meet the three planning roles - economic, social and environmental.

It is submitted that the case for the SGGC within the GB and consequent drawing of a new GB boundary has not been robustly or transparently made. The need to promote sustainable patterns of development is not fulfilled by the SGGC which is nothing but a dormitory of housing for people to travel to work elsewhere. The Framework requirement is simply not met.

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?

No. The PC’s position on this issue has been explained elsewhere in its Examination representations on Matters 1 and 2 and in the Examination representations of the OLRG.
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?

No. The Collective Regulation 18 representations of the PC, OLRG and others included Counsel’s opinion that the GB Assessment methodology (GB14) was rushed, included a number of failings and consultation was inadequate. The issues in those representations were largely ignored. As a result, the methodology gave rise to flawed assessments.

The PC considers that the site selection methodology for the SGGC was not robust and the reason for the alteration to the GB boundary at South Godstone is unjustified. This is explained in the response to Matter 6. Significantly the early preference and choice of South Godstone for a GC exerted a wrongful influence on the preparation of the Local Plan and infected the remainder of the process. The selection of South Godstone was not part of an inclusive and robust analysis.

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?

No. Godstone PC does not accept that an exceptional circumstances, or a need case has been made. The foundation block for such a case must be that no stone has been left unturned to prepare and deliver a sound planning strategy where all reasonable alternatives for development have been considered and weighed in the planning balance. If the end of that process, there is a level of development or a major site that needs to be considered in the GB then that is when consideration of exceptional circumstances in GB terms arises.

However, just because there is an identified level of development or a major site does not mean that an exceptional circumstances case has been made it is still necessary to assess the harm to the GB to inform the final judgement. Being pre-disposed to a new settlement in the GB does not override the need to rigorously examine the case and consider all other reasonable alternatives.

Moreover, the Council’s approach conflicts with the Framework (paragraph 14) which recognises the GB as a constraint. The NPPG requires that HELAAs identify all the relevant constraints to establish realistic assumptions. It is self-evident that this principle requires continued recognition of existing GB boundaries to be the starting point when bringing forward a new Plan. There is no provision in either the Framework or NPPG for a
different version of a HELAA which excludes the Green Belt as a constraint. It also follows that the need to show exceptional circumstances is also a constraint which should be included in the HELAA. The Council appears to fundamentally misunderstand the NPPG, the Framework and past and present GB policies.

The difficulty in meeting housing land supply inside the GB and the Government's housing agenda and drive for sustainable development, means that in a district such as Tandridge, where GB land makes up a very substantial proportion of the administrative area, there is pressure to consider land in the GB to satisfy development needs. The Part 3 assessment (GB1 & 2) purports to set out the case for the exceptional circumstances for the SGGC.

It is informative to look at how exceptional circumstances have been examined in GB1. This is undertaken in section 3 of the document and paragraph 3.4 sets out six conclusions (lettered a - f) as to how a case for exceptional circumstances might arise for altering a Green Belt boundary. Reference is also made to the Calverton Parish Council case. There then follows sub-sections dealing with:

1. The acuteness/intensity of the objectively assessed need
2. The inherent constraints on supply/availability of land prima facie suitable for sustainable development
3. The consequent difficulties in achieving sustainable development without impinging on the Green Belt;
4. The nature and extent of the harm to the Green Belt (including the wider Green Belt) and those parts of it which would be lost if the boundaries were reviewed
5. The extent to which the consequent impacts on the purposes of the Green Belt may be ameliorated or reduced to the lowest reasonably practicable extent

Those sections will only provide an exceptional circumstances case if the first two are fully and properly demonstrated. If that were to be the case, then iii) to v) would come in to play. GPC supports the arguments and representations of the OLRG that explain why the housing requirement figure for Tandridge is unsound. It follows that if that is the case, and sub-sections i) and ii) fall, then there would be no exceptional circumstances to release land from the GB for a Garden Community.

As to sub-section iii), the Council has not demonstrated why the proposed incursion into GB in the case of South Godstone would achieve sustainable development, particularly when compared with other strategic development options. Further, the Council fails to acknowledge the significance of the openness of the Green Belt in the consideration as to whether GB land should be released for development. In relation to sub-sections iv) and
(v) there can be no question that the harm to the openness of GB would be substantial and it is difficult to see how the impacts on GB purposes can be satisfactorily ameliorated or reduced. The Council has not properly demonstrated a satisfactory answer to these questions.

In the ordinary course of events new development in the GB is considered inappropriate development unless it is for one of the few exceptions (paragraphs 89 and 90 of the Framework 2012). Framework paragraph 87 advises that inappropriate development is, by definition, harmful to the GB and should not be approved except in very special circumstances. A Garden Community (in the terms used by TDC) in the GB would be in conflict with the third purpose of a Green Belt - safeguarding the countryside from encroachment - and in so far as the fifth purpose is concerned, a Garden Community would plainly not assist in the regeneration of urban land due to the rural location.

The Local Plan fails, in overall terms, to demonstrate credible exceptional circumstances for the proposed alterations of the boundaries of the Green Belt at South Godstone in association with the SGGC.

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?

No comment