Representation by Chartwell Land & New Homes Ltd to Matter 6: Housing Allocations Policy HSG17 Land at Farleigh Road, Warlingham in advance of the Examination in Public into the Regulation 22 Version of Our Local Plan: 2033 January 2019

September 2019
Response to Tandridge Local Plan Housing Proposals re: HSG17: Land at Farleigh Road, Warlingham

Para 6.88 - What are the exceptional circumstances for the release of the site from the Green Belt?

Paragraph 214 of the NPPF February 2019 confirms that the NPPF published in 2012 will apply for the purpose of examining plans, where those plans were submitted on or before 24th January 2019. The Tandridge Local Plan was submitted prior to the stated date and the 2012 NPPF is accordingly applicable. Reference is also made to the updated version of the NPPF, where relevant.

Paragraph 83 of the NPPF (2012) (paragraph 136 of the NPPF February 2019) states that once established Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or review of the Local Plan. At that time GB boundaries should be considered having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period. Tandridge Council has assessed the site in the context of the need to promote sustainable patterns of development and examined fully all other reasonable options for meeting its identified need for development before concluding that exceptional circumstances exist to justify the proposed change to the Green Belt boundary associated with HSG17.

Alternative available land supply – this has been assessed under the Tandridge Local Plan 2013 – 2033: Regulation 19 Housing topic paper and the Sustainability Appraisal (Regulation 19 – 2018) which set out detailed consideration and explanation of reasonable alternatives. The contents conclude that there is a limited amount of suitable brownfield sites available, that optimum densities have been considered and assessed, and that neighbouring authorities have different housing market areas and where these authorities cannot meet their own needs due to other constraints. The Council has also undertaken and published a Strategic Housing Market Assessment (SMHA) and associated Objectively Assessed Need (OAN) as well as an affordable housing assessment. At the strategic level the conclusion has been reached that there is justification for the release of some Green Belt land under exceptional circumstances. This site is one of 15 housing sites identified as having exceptional circumstances:

1. The site sits immediately adjacent to the built confines of Warlingham, recognised as a sustainable Tier 1 settlement and which is a preferred location for development as part of the spatial strategy. It is close to local facilities including schools, public transport, employment and a GP surgery. It is seen to be strategy compliant and capable of achieving sustainable development.

2. The site is well contained by reason of it bordering built development to the south and east and to an extent the west. It is also partially developed and has good topographical features rendering it feasible to introduce development without giving rise to impact on the countryside setting to the north.

3. The site is well defined and the opportunity presents itself to introduce strong vegetation screening to the north to protect open land and to the west to ensure the historic setting of the nearby All Saint's Church is protected. Robust and defensible boundaries can accordingly be readily accommodated to limit impact on Green Belt purposes. A buffer zone on the northern boundary can also be introduced to protect the Ancient Woodland to the north.
4. Housing development would make a contribution of 50 units to the District’s housing need and is capable of being delivered in the short term.

5. Development can be achieved in a manner that does not impact on the setting of listed buildings and can be readily assimilated within the existing built confines of the settlement.

6. Any surface water flooding can be readily mitigated.

7. The residential development of the site would contribute towards infrastructure needed to support the growth of the District. CIL payments would be attracted as well as other benefits that have been identified by the Council, which relate to addressing congestion alleviation at Sunny Bank, the introduction of a youth play space and provision of a cycle route from Warlingham Green to Upper Warlingham Station.

The site has been assessed as part of the Council’s Green Belt assessment (Part 3): exceptional circumstances. Having regard to the detailed considerations and assessments undertaken, it is accordingly agreed that exceptional circumstances prevail to justify the release of this land from the Green Belt.

Para 6.89 - Is the proposed Green Belt boundary justified and consistent with national policy as set out in paragraph 85 of the framework? (Now para 139 of the NPPF 2019).

The site benefits from being sited within a sustainable location, immediately adjacent to the built confines of Warlingham and with ready vehicular access. Furthermore part of the land is already built on and the land serves no purpose in keeping permanently open.

The site is well confined and closely related to the existing housing development to the south and east. The introduction of a strong boundary delineation to the north by way of mature vegetation is both recognisable and will ensure a permanent buffer is secured between the redefined urban area and the Green Belt land to the north.

Para 6.90 - Are there requirements for financial contributions as set out under the Infrastructure consistent with national policy for planning obligations and conditions as set out in the Framework and are they justified?

The development will be subject to a CIL. In addition, the Council has identified a requirement for a cycle route from Warlingham Green to Upper Warlingham Station which can be accommodated as part of the residential scheme. It is also understood that there is a requirement to alleviate congestion at Sunny Bank and provide a youth place space as part of the development proposals in accordance with the Infrastructure Delivery Plan.

It is confirmed that these are justified and considered consistent with paragraphs 203-206 of the NPPF (paragraphs 54 – 56 of the NPPF 2019).

Para 6.91 - Are there any matters which would mean that the site is not deliverable or developable as per foot notes 11 and 12 to the Framework? (This is now contained with Annex 2 glossary for definitions of deliverable and developable under the NPPF 2019.)
It is confirmed that the site is available now and sits within a suitable location. There is a realistic prospect that housing can be delivered on the site within the next five years and development of the site at the density proposed is viable.

It is accordingly confirmed that the site is both deliverable and developable in the context of footnotes 11 and 12 of the NPPF 2012.

Para 6.92 - Are the proposed Modifications necessary for soundness?

It is considered that the Local Plan has been positively prepared, justified, effective and consistent with national policy. The review and modifications undertaken, which includes the proposed release of site HSG17 from the Green Belt, are accordingly deemed necessary for soundness.

Signed:…….

Rob Anderson  
Managing Director  
Chartwell land & New Homes Limited