1. Introduction

1. This hearing statement submitted by Impact Planning Services Limited on behalf of Knightwood Trust Farms Ltd (KTF), develops the case made at the submission plan (Regulation 19) stage in light of the Inspector’s questions on this matter and issue. The representation reference is 1185198.

2. Questions 6.1 to 6.10 are the most relevant to the submission on this issue made by KTF.

2. Statement

SG01: South Godstone Garden Community

Issue: Is the policy for the allocation of a broad location for a Garden Community at South Godstone justified, effective and consistent with national policy?

3. This statement confirms that the answer to question 6.1 Is the approach that the specific details of the proposed Garden Community would be determined through an Action Area Plan (AAP) effective and is it clearly justified to address these matters in an additional development plan document? Is yes. Paragraph 47 of the Framework (NPPF) requires local planning authorities to identify sites or broad locations for growth for years 6 to 10 and where possible for years 11 to 15. This is exactly what Tandridge District Council has done. The preparation of an AAP also conforms with national policy as stated in the Planning Policy Guidance at ID: 12-012.

4. The Regulation 19 submission made by BWB on behalf of KTF, provides a comprehensive set of documents and information to justify the inclusion of the land shown in the plan ‘Area of Search changes’ on page 254 of the ‘Regulation 22 Submission’ Local Plan January 2019 (MD1). These include a Built Heritage Statement in Appendix D which shows the site extent for this report at Figure 1 on page 3. The Heritage Statement concludes that there would be potential impacts upon the significance within setting, of Brook Farm House falling within the site and Brook Cottage which adjoins the site. The extent of any impact will be less than substantial and capable of mitigation through development layout, scale, disposition of open space and landscape treatment. All of this can be addressed through the AAP.

5. Question 6.2 Was the broad location for the proposed Garden Community selected on a robust basis? Yes, the background to the selection of the broad location is justified by
HELAA 2017/2018 (SAD3), the Statement of Consultation Local Plan Garden Villages Consultation Regulation 18, 2018 (SCON1), the Garden Villages Consultation responses 2018 (SCON2) and the TDC Local Plan 2033 Sustainability Appraisal January 2019, Volumes 1 to 3 and the Appendices (MD4 to MD7), and the Habitats Regulations Assessment (MD8).

6. The issue of multiple owners on part of the Garden Community site will need to be addressed and the issue of CPO may be the ultimate way of assembling all of the land. However, the AAP can be prepared with this knowledge and land more readily available can be put forward for earlier development under a clear and justified phasing programme.

7. **Question 6.3 Is the proposed broad location in a suitable location for housing development?** The answer to this is **yes**. This has been answered by the comments to question 6.2.

8. On the **question 6.4 How was the proposed broad location defined and is the defined extent justified?** the responses given above provide the clarification about the process used by TDC. The defined extent with the additional land of KTF is justified by the reports and consultation stages outlines above. However, as there will need to be additional land the area of search should be broadened to retain the area as shown in the Regulation 22 Plan (MD1) and because of the constraints around this area, an extension to the south may provide more opportunity for smaller and medium sized developments which will benefit from the existing and proposed new infrastructure for the Garden Community. The Sites of Importance for Nature Conservation and heritage will need to be protected and where possible enhanced.

9. **Question 6.5 How has the identification of the proposed broad location taken into account the significance of designated and non-designated historic heritage assets? Where is the evidence that the Council has identified and assessed the particular significance of heritage assets within or outwith the defined area of search where their significance may be harmed through development within their settings?** The heritage issues have been assessed in the Regulation 19 submissions by KTF as outlined in the above response to question 6.1. This only relates to the area identified in that report. On the matter of wider heritage assessment, the TDC sustainability appraisal (documents SSHA2 to SSHA5) deals with heritage issues under the SA objective 3. However, if the area of search was broadened then areas of higher sensitivity could be protected whilst ensuring that TDC delivers a new Garden Community for 4,000 homes and all the necessary infrastructure as set out in the Local Plan

10. On the **question 6.6 Is there evidence that land within the proposed broad location would not be available for development?** the need for mitigation recognised in the Regulation 19 submissions by KTF addressed the heritage assets within and adjacent to the site. With regard to the landownerships, there is part of the site which has been split into multiple ownerships but this difficulty can be overcome. The new town of South Woodham Ferrers in Essex was created partly because of the impact of ‘plotlands’ where multiple owners had carried out developments on an ad hoc basis. The use of CPO powers led to the assembly of
the land for the development of the new town. The same principles can apply on this part of South Godstone.

11. Question 6.7 Is there sufficient evidence in regard to possible infrastructure requirements to suggest that there is a reasonable prospect that homes could be built at the proposed Garden Community in the Plan period as set out in the Plan’s trajectory? Points to consider include:

• Any necessary improvements to Junction 6 of the M25;

• Any necessary improvements to the A22;

• Any necessary improvements to South Godstone Railway Station;

• Whether the infrastructure requirements have been sufficiently considered and costed so as to inform the high-level viability of the proposal?

• Whether there are any infrastructure requirements which would mean that the site could not be viably developed at the point envisaged?

This detailed question is addressed by the Infrastructure Delivery report (INF2 and related documents).

12. Question 6.8 When would the proposed Garden Community realistically deliver the first homes? What is the realistic rate of delivery which should be assumed? The response to this has been provided in the hearing statement for Knightwood Trust Farms Ltd to matter 2 sections B and C.

13. Given the affordable housing need identified for the HMA, is it effective to leave the definition of a target for affordable housing to the AAP? This is question 6.9 and the response is yes, because the affordability considerations move with time. As the strategic nature of this proposal means that it will be developed over a number of years, there is a case to review the calculations for affordable homes as the development progresses. This not only allows a more responsive approach, but it will also allow the overall viability of the scheme which involves a wide range of infrastructure costings to be taken into account at the appropriate time.

14. Finally, on this issue question 6.10 Are the proposed Modifications necessary for soundness? the answer is yes, although this is only in respect of the South Godstone Garden Community. Because of the representations made on the quantum of new housing under matter 2, it is recommended that more Modifications will be necessary to make to Plan sound.