HEARING STATEMENT

On Behalf of Ashill (Respondent ID 996072)

Matter 6 (HSG11)

September 2019
1.0 Introduction

1.1 On behalf of our client, Ashill, CBRE is instructed to submit Hearing Statements to the Tandridge District Council ‘Our Local Plan’ 2033 (July 2018) (hereafter ‘the Plan’).

1.2 Ashill has an interest in three sites within Tandridge that they have been promoting through the Local Plan process. These include:

- GOD 001 – Godstone Reservoirs
- CAT 019 – Caterham Reservoir
- OXT 021 – Land west of Red Lane. This is Draft Site Allocation HSG13.

1.3 As discussed in more detail within the five Matter Statements (1, 2, 3, 4, 6), both omission sites (GOD 001 and CAT 019) are strategically located and offer a solution to the identified issues of soundness with the submitted plan. A separate Matter Statement has been provided in respect of the Inspector’s Questions for Site HSG13 which is allocated in the Plan.

1.4 GOD 001 and CAT 019 are both owned by Surrey and East Surrey Water, a major local employer within the wider area. Land west of Red Lane is being jointly promoted by the two landowners, Surrey County Council and Ashill.

1.5 Ashill have previously made representations during the Our Local Plan: 2033 (Regulation 19) August 2018 and Local Plan: Garden Villages Consultation 2017. The representation references for this submission is 996072.
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QUESTIONS FOR HSG11 LAND WEST OF GODSTONE

6.53: Is the Policies Map in respect of the boundary of the Surrey Hills Area of Outstanding Natural Beauty (AONB) correct?

Response

2.1 No. The Policies Map North does not include the boundary of the Surrey Hill AONB. For comparison purposes the download for the Surrey Interactive Map showing the extent of the AONB is included below:

6.54: Does the allocation constitute major development within the AONB?

Response

2.2 Representations submitted to the Regulation 19 Stage of the Plan show an indicative masterplan for the site which includes residential development within the AONB. The intrusion into the AONB on the masterplan is key to delivering (1) the required access to the site allocation and (2) a comprehensive and complete development on the site. The allocation thus represents major development in the AONB.

2.3 Paragraph 114 and 115 of the NPPF is clear in directing that LPAs should place ‘great weight…to conserving landscape and scenic beauty in National Park, the Broad and Areas of Outstanding Natural Beauty.’ It continue to state that AONBs ‘have the highest status of protection in relation to landscape and scenic beauty.’

2.4 Paragraph 116 states the considerations under which development in the AONB should be permitted. As part of the assessment exercise considerations should be given to ‘the cost of, and scope for, developing elsewhere outside the designated area, or meeting the need for it in some other way.’

2.5 GOD 001 represents an alternative to developing in the AONB. The reasons for rejection of GOD 001 (ecology and landscape) are not ‘absolutes’ (i.e. they are not covered by Footnote 9 of the NPPF) but can be addressed through mitigation policies and enhancement. GOD 001 offers the opportunity for biodiversity improvements and the dense woodland belt surrounding the site offers a natural screening to the site, and importantly the wider AONB, that GOD 010 does not benefit from.

2.6 In respect of soundness, it is not consistent with the NPPF for a site to be allocated that would result in major development in the AONB ahead of other available and suitable sites that are outside of the AONB. Such an approach does not provide the AONB with the ‘great weight’
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of protection/perseveration that it is afforded through the NPPF. An assessment exercise undertaken consistent with the principles of the NPPF would identify GOD 001 as the preferred option for allocation.

6.56: Are there any matters which would mean that the site is not deliverable or developable as per footnotes 11 and 12 to the Framework?

Response

2.7 The proposed access road for the HSG11 site allocation is shared with an operational Haul Road that serves Godstone North Quarry. We understand that the quarry has previously sought extensions to the period of extraction on the site. Any further extensions on the site could prevent the proposed development at HSG11 coming forward on highways grounds with pedestrian, cycle and vehicular access being shared with HGV movements.

2.8 If further extraction, and in turn use of the Haul Road is required, this may affect whether the site is deliverable and developable as per the NPPF.
3.0 Main Modifications Required to Matter 6

3.1 In order to address the soundness issues identified in response to Matter 6 the following amendments are required to the Plan:

1. The Policy Map should be updated to include the Surrey Hills AONB.

2. Removal of HSG10 from the Plan in light of the availability of sites that do not result in major development in the AONB.