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 The allocated site is in an amalgamation of 3 land parcels which were previously submitted through the Housing and Economic Land Availability Assessment process under references OXT 021, OXT 048, and OXT 063 (part of).

1.4 Part of the site is owned by Ashill Land Ltd, who are represented by CBRE. Part of the site is owned by Surrey County Council, who are represented by Vail Williams. Whilst part of the site to the south is owned by Fairalls. The landowners are co-operating to deliver the site.

1.5 As part of the submission process a Statement of Delivery has been entered into between the main landowners on the site.

1.6 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.
2.0 Matter 6: Housing Allocations

QUESTIONS FOR HSG13 - LAND WEST OF RED LANE, HURST GREEN

6.67: What are the exceptional circumstances for the release of the site from the Green Belt?

Response

2.1 As acknowledged by the Council, it is clear that (1) the acuteness/intensity of the objectively assessed need for housing, (ii) the inherent constraint on the supply/ availability of land suitable for sustainable development (94% Green Belt) and (iii) the inability of the Plan to delivery sustainable development in line with the NPPF without Green Belt release confirms that exceptional circumstances exist.

2.2 At the local level, and through response to Question 6.68, there are local exceptional circumstances to justify development.

6.68: Is the proposed Green Belt boundary justified and consistent with national policy as set out in paragraph 85 of the Framework?

Response

2.3 The site is physically and visually well contained by built form to the north, the railway line to the west and Red Lane to the east and, subject to the use of sensitive design that relates positively to the Green Belt and surrounding landscape, the impact on the wider Green Belt would be minimised. Siting of development in this location would provide a natural infill to the built-up area and as such housing development in this location would make a positive contribution to the settlement pattern effectively completing it.

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

Response

2.4 Paragraph 205 of the NPPF is clear that flexibility should be incorporated into proposed obligations to prevent planned development from being stalled. To ensure consistency with the NPPF we suggest that the policy wording is amended to reflect this. The required revision is included over the page.

2.5 Notwithstanding this, when considered against the test of Paragraph 204 of the NPPF it is important that the obligations being sought can meet these requirements. The approach of the Plan to include a prescriptive list is inflexible and may unintentionally create conflict with the NPPF. The suggested approach to include broad topic themes is required for soundness.

6.70: Is the text under ‘Strategic Opportunity’ justified, effective or necessary? Does the policy provide a clear indication of how a decision maker should react to a development proposal?

Response

2.6 As drafted, the policy is not clear of what is expected from this site in terms of the desire for an all-through primary school. The current wording does not provide certainty for residents, landowners nor the education department as to what the Plan intends for the site.

2.7 We have discussed the educational requirements with Surrey County Council who have confirmed that there is no requirement for the school/schools to be relocated and therefore this reference should be deleted as it is not justified, effective or necessary. Confirmation that the site is not required for educational needs is also confirmed in the Vail Williams representations (on behalf of Surrey County Council) to the Regulation 19 Plan consultation.
2.0 Matter 6: Housing Allocations

6.71: 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

There are no matters which would preclude the site from being delivered or developable. The promoters of the site have confirmed this through a Statement of Delivery with the Council.

6.72: Are the proposed Modifications necessary for soundness?

Response

We have included below an amended version of the allocation to incorporate those changes that are needed for soundness. These changes are shown in Green and as strikethroughs. The Council’s proposed modifications have also been included for completeness.

2.10 For allocated sites in the Plan it is important that their contribution to meeting the OAN is maximised. Site allocation HGS13 – Land West of Red Lane includes development at a density of just 21 DPH. We do not consider that opportunities to maximise housing delivery on the site have been exhausted and it would be consistent with the NPPF and the context of the local area for this to be increased to 80 units – representing 28 DPH.
## 2.0 Matter 6: Housing Allocations

<table>
<thead>
<tr>
<th>Site Size:</th>
<th>2.8ha</th>
<th>Use/ Estimated Site Yield</th>
<th>(C3)</th>
</tr>
</thead>
</table>

### Site Description

The site is comprised of fields and a limited number of residential properties. It is located south east of Hurst Green and adjacent to the existing built-up area. The railway line borders the western edge of the site with the main built form to the north. The site is contained by Red Lane on the eastern side and woodland to the south. Other evidence-based references: HELAA OXT 021, OXT 048 and OXT 063.

### Site-Specific Policy

In addition to according with relevant development plan policies and material considerations, complying with other relevant policies of Our Local Plan including those relating to affordable housing and design, applications will be supported where the following site-specific matters/requirements are addressed:

**Green Belt Amendment**

The exceptional circumstances to justify the release of this site from the Green Belt have been identified and the allocation of this site has resulted in an alteration to the Green Belt boundary. Due to the undeveloped nature of the land, proposals will be required to provide 40% affordable housing.

**Ecology**

1. Woodland and hedgerow buffer zones will be a requirement of the development which should maximise on the opportunity for wildlife corridors and screening for the site.
2.0 Matter 6: Housing Allocations

New Defensible Boundaries

II. Design and layout should actively seek to create and preserve, clear and defensible boundaries between the edge of the site and the Green Belt to which it is adjacent.

Public Rights of Way

III. Any Public Right of Way within or abutting the site should be retained in liaison with Surrey County Council and TLP31.

Infrastructure

IV. In accordance with the Infrastructure Delivery Plan (IDP), financial contribution to/onsite provision of the following infrastructure are relevant to the development of this site and may be a requirement of any proposal:

- Increased capacity to Hurst Green Station car parking
- Footpath extension at Mill Lane
- Pedestrian crossing on Pollards Oak Road
- Multi-use sports hall
- Playground improvements at Warren Lane Park and Mill Lane recreation ground
- Allotment provision
- Youth play space
- Oxted Library refurbishment
- Cycle route from Holland to Hurst Green Station

- Playspace and Community Infrastructure Enhancements
- Highways, Cycle and Pedestrian Improvements where evidence deems it required.

Applicants will need to have early engagement with the Environment Agency and Water companies to discuss odour issues and resolve these, where necessary.

Strategic Opportunity

It is recognised there may be an opportunity to rationalise the current infant and junior school sites with this site to provide an all through primary school. However, any redevelopment of this nature would need to be explored and agreed with the Surrey Education authority. Until such support is justified and agreed, the site will be considered for housing development.
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. Inclusion of the suggested amendment to Policy HSG13 as set out on Page 4 and 5.