Tandridge District Council ‘Our Local Plan: 2033’ Examination Hearing Statement in response to the Inspector’s Initial Matters, Issues and Questions, Document ID/5 V3 submitted by the Woldingham Association

**Matter 7 Employment land allocations**

**Issue: Are the proposed employment land allocations justified, effective and consistent with national policy?**

**IES06: Paddock Barn Farm, Godstone Road, Caterham**

7.41 What is the purpose of the allocation? Given that the site is situated in the Green Belt and national policy in paragraph 89 of the Framework sets out that the construction of new buildings in the Green Belt should be regarded as being inappropriate other than in the listed exceptions, would the Policy be effective in providing for the intended employment development? In terms of paragraph 154 of the Framework, does the Policy provide a clear indication of how a decision maker should react to a development proposal?

7.1 We see no purpose in the allocation because:

a. the employment growth scenarios and land needs on which the employment spatial strategy and allocations are unrealistic due to unrealistic assumptions about future economic and employment growth in Tandridge. We explain this in more detail in our answers to Matter 2/Q2.5 and Matter 5.

b. the allocation is contrary to paragraph 84 of the Framework because it is not located near either public transport or homes and has no relation to any built-up area at all, and so the private car is the only viable option for travel to the site.

7.2 Extending the site by 0.44ha and/or allowing for “intensification” is also not justified as the ECRT9: 2015 Tandridge ENA shows that there is an excess of industrial land in the District. This is confirmed by the employment studies that surveyed businesses in Tandridge indicating their interest in smaller units in existing built-up areas, such as
Caterham and Oxted, and not large industrial sites in remote/rural locations such as this one.

Suggested alternative

7.3 For the reasons given above, in Matter 5 and in paragraphs 23.16 to 23.23 of our Regulation 19 representation, we conclude that Policy IES06 should be removed.

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<th>7.42 Would the proposed allocation conserve the landscape and scenic beauty of the AONB?</th>
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<td>7.4 No, we believe that allocating this site and proposing its expansion to possibly include a large new warehouse does not conserve the nationally important designated Surrey Hills AONB as required by paragraph 115 of the Framework. This is a visually sensitive site with views from a variety of public and private viewpoints due to the undulating topography.</td>
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<td>7.5 Instead, the policy encourages both encroachment into the countryside and into the AONB, as well as the construction of new buildings, which is, inappropriate development in the Green Belt.</td>
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<th>7.43 To be effective and be consistent with national policy as set out in paragraph 24 of the Framework, should the Policy be clear as to whether Use Class B1 (Offices) or other main town centre uses would be acceptable within the identified site boundary?</th>
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<td>7.6 With regards to paragraph 24 of the Framework, this is a remote rural former farm located in the Green Belt/AONB and so not located in either a “town centre” or “edge of centre” location. While it is adjacent to the a22, it is still amidst undeveloped land.</td>
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7.7 Encouraging town centre uses in this remote site would encourage sprawl into the Green Belt/AONB, which we believe to be contrary to national Green Belt policy.

7.8 It would also potentially harm Caterham Valley town centre due to the possible dilution of the critical mass of “main town centre uses”. It is essential that a critical mass be maintained to ensure thriving town centres.

7.9 For these reasons, we do not believe that main town centre uses should be acceptable on this site.

7.45 Are the proposed Modifications necessary for soundness?

7.10 Yes. However, for the reasons above and in Chapter 23 of our Regulation 19 representation, we conclude that the policy should be removed.