Land at Godstone Road/Longsdon Way, Caterham

Tandridge Local Plan – EiP Statement Matter 8

Boyer

Prepared on behalf of Croudace Strategic Ltd | September 2019
1. **MATTER 8: DEVELOPMENT MANAGEMENT POLICIES**

1.1 This statement has been prepared by Boyer on Behalf of Croudace Homes Limited, in response to the Inspector’s Initial Matters, Issues and Questions set for Matter 8 in relation to the development management policies proposed in the Local Plan.

1.2 Our comments specifically concern issue TLP34: Area of Great Landscape Value and Area of Outstanding Natural Beauty Candidate Areas.

**TLP34: Area of Great Landscape Value and Area of Outstanding Natural Beauty Candidate Areas**

*Would the retention of the designation of Areas of Greater Landscape Value (AGLV) until the Surrey Heaths AONB Review is completed apply any different development management requirements to the AGLV rather than that set out at TLP34?*

1.3 Proposed Policy TLP34 creates unnecessary ambiguity regarding the treatment of applications for development within the AGLV. As indicated in our response to the Regulation 19 consultation, it is already understood that much of the AGLV falls outside of the ‘AONB Candidate Areas’ identified by Natural England in 2013.

1.4 It is accepted that where land is not identified as falling within a candidate area, it is highly unlikely that it will be subsequently included within the revised boundaries of the Surrey Hills AONB.

1.5 Policy TLP34 acknowledges this, stating:

> “Following completion of the AONB review, any land which does not form the new boundary for the Surrey Hills [AONB], will no longer hold AGLV status and applications will be assessed in accordance with TLP32.”

1.6 As it is already accepted that non-AONB candidate sites will not be retained in the AGLV in future, the policy will effectively be made redundant, potentially quite soon after the Plan is adopted. This is not a justified or effective approach, nor is it consistent with national policy, as the AGLV is a legacy designation that predates the 2012 NPPF. Policy TLP34 should be revised such that it only applies to AONB candidate sites. Policy TLP32 ‘Landscape Character’ provides a sufficient basis for assessing the landscape impacts of a proposed development, and there is no need to duplicate it.

*Is the application of the principles for protecting the AONB to the AONB Candidate Areas consistent with national policy given those areas are not protected landscapes?*

1.7 NA.

*Are the proposed Modifications necessary for soundness?*
1.8 Policy TLP34 has been modified in a way which diminishes the soundness of the Plan. The AGLV is an historic designation, which was not established in the context of the archived NPPF and which the Plan in any case proposes to make redundant. Yet, the proposed modifications suggest that applications for development in the AGLV would need to demonstrate that they would not harm the distinctive character of the AGLV. This is not a logical approach and it serves to undermine the effectiveness of the Plan. Indeed, as noted above, TLP34 (as it is proposed to apply to sites within the AGLV) is superfluous, as Policy TLP32 provides a sufficient basis to assess landscape impacts.