Tandridge District Council: Examination of ‘Our Local Plan: 2033’

Tandridge District Council Hearing Statement

Matter 6 South Godstone Garden Community and housing allocations

September 2019
Notes:

1. The term ‘The Council’ or the abbreviation ‘TDC’ is used as shorthand for Tandridge District Council
2. The abbreviation LP is used for the submitted ‘Our Local Plan 2033’
3. All quotations are distinguished in italics and referenced in brackets
4. All references are to published LP evidence documents and the 2012 NPPF and associated 2014 PPG unless otherwise stated
5. This Hearing Statement deals with Matter 6: South Godstone Garden Community and housing allocations. The housing allocations include sites proposed for release from the Green Belt. For each of those sites, the following question is asked:

‘What are the exceptional circumstances for the release of the site from the Green Belt?’

The way the Council has considered site specific exceptional circumstances is explained in the Green Belt Assessment (GBA) (GB series of evidence documents).

However, some particular points should be noted when reading the Council’s response to these questions:

a) The GBA is based firmly on consideration of NPPF Green Belt purposes. However, to conduct a meaningful assessment in Tandridge some local application of NPPF terminology must be undertaken. This is particularly in that:

   • ‘sprawl’ and ‘merging’ is in relation to all significant settlements (as defined in GB14 Para. 4.1), rather than simply to ‘large built up areas’ and ‘towns’

   • the setting and special character of historic settlements is of all kinds, not just ‘towns’

b) As set out in the Council’s responses to Matter 4, the Council has applied the five considerations set out in the Calverton judgement (which is a useful guide to how exceptional circumstances can be considered). This has included both an overarching strategic level assessment (considering development need) and site-specific level assessments of harm arising from release.

The site-specific conclusions are summarised against the relevant site question responses. This includes conclusions against the four key Green Belt purposes. The sites have not been considered against Purpose 5 (to assist in urban regeneration, by encouraging the recycling of derelict and other urban land) because:

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By its nature and designation, all Green Belt should contribute to the recycling of derelict and urban land as it is generally a prohibitive designation where development is rarely acceptable. However, in reality it is very difficult to consistently assess how Green Belt designation is directly responsible for brownfield development. This is because an assumption is being made about the viability and developability of brownfield sites, when in reality a site may not come forward, irrespective of whether an alternative site was available and other barriers to development may exist such as land price or contamination.

For this reason, purpose 5 has always proved to be difficult to assess for particular areas, and can only be effectively considered on a case by case basis if and where a site is being considered for development. Therefore the GBA will not assess parcels against Purpose 5 as part of the Green Belt Assessment process. Such assessment will only be considered if and when necessary through the formal Local Plan process.

(GB14 paragraphs 3.35-3.36)

That said, the Council has considered the role of urban regeneration and the need to prioritise non-Green Belt areas for development as far as is practicably possible through the overall plan-making and land allocation process. Due to the limited options available for development which does not impact upon the Green Belt, it is not considered that Purpose 5 can be applied as effectively as in areas which have more non-Green Belt land available to them. Policies to encourage regeneration are also included within the LP and it is therefore felt that Purpose 5 has been considered pragmatically and proportionately, in the round.

6. This Hearing Statement deals with Matter 6: South Godstone Garden Community and housing allocations. For many of the housing allocations, the following question is asked:

‘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?

The responses to these questions are made on the basis that the Council has suggested that the Inspector considers a series of Main Modifications on this topic (set out in TED01). The Modifications acknowledge that some of the originally proposed infrastructure items (particularly SCC highways, education and libraries infrastructure) should not be included in the policy as requirements linked to the developments. This is for the reason behind the questions; they are not now regarded as justifiable (in terms of NPPF Para.204):

- (to) make the development acceptable in planning terms;
- (as) directly related to the development; and
- (as) fairly and reasonably related in scale and kind to the development.

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SCG01: 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?
6.1 Is the approach that the specific details of the proposed Garden Community would be determined through an Area Action Plan (APP) effective and is it clearly justified to address these matters in an additional development plan document?

Response to Inspector’s Issues / Question

6.1.1 Yes. Whilst it is recognised that Government preference leans towards a single comprehensive development plan, the PPG does recognise that matter specific plans such as Area Action Plans can be prepared where justified (Paragraph: 013 Reference ID: 12-013-20140306). The Council believes it is fully justified in its approach and that an Area Action Plan will be effective in delivering the development.

6.1.2 The Area Action Plan (AAP) will be specific in dealing with policies, guidance and all other planning matters relevant to the South Godstone Garden Community (SGGC). The LP (MD1, TLP01, SGCO1) provides the foundation, strategic ‘hook’ and principles upon which the AAP can be developed. As such, the AAP will be prepared at the appropriate time and in the knowledge that the principle of development within that area is already established. This mitigates against carrying out premature detailed work which will be necessary for a location specific plan. It is considered that a development which is of this significance and which has numerous implications for the community and the District, needs the attention, thought, consideration and scrutiny that can be provided though an AAP.

6.1.3 It is the Council’s view that a development of the nature and scale of a Garden Community must be guided by key principles from its inception. This ensures that aims for the development will reflect the aspirations of the Council and the community and the best benefits will be delivered. The LP (MD1) establishes this foundation at Chapter 33 by setting the principles, vision and objectives that both guide the preparation of the AAP and development itself. Such a development is an entirely new concept for the otherwise rural Tandridge District and, for the benefit of communities, stakeholders and other interested parties, an AAP approach is necessary. The principle of development must be established, through the adoption of the Local Plan, before essential more detailed work can take place. It will be for the master-planning process and the policies of the AAP to set the finer grain detail, including layout, boundaries, phasing, design and infrastructure etc. All interested
parties can be involved in this, through direct engagement and formal consultation, with attention to the necessary level of detail.

6.1.4 The Council recognise that there are alternative ways of delivering at scale, which some may argue would expedite delivery, including through the twin tracking of the LP and an application, or via the use of a Supplementary Planning Document. However, these alternatives are not considered appropriate in this case. The delivery of South Godstone Garden Community is integrally related to the delivery of key strategic infrastructure including improvements to the A22 / M25. It is considered appropriate that the AAP be worked up alongside other work streams which can support and complement delivery. This allows for proper consideration of constraints and design etc. as the scheme evolves.

6.1.5 One specific issue where the AAP approach will assist is in maximising the rate of housing delivery at SGGC. Collaborative work with landowners and possible direct Council involvement in land assembly and infrastructure provision could result in higher rates of delivery. This is noted in the potential alternative trajectory (270 dpa yield) in the Housing Topic Paper (HNS2). This potential has been explored in the Council's advance work on SGGC implementation. It is not LP assumption, but is a very real prospect.

6.1.6 Given the challenges of boosting housing supply in the District, not least because of the 94% Green Belt designation and infrastructure capacity issues, it is considered that a staged approach, through an AAP is the most appropriate and justified way forward. It will be effective in securing well planned development at the scale of a new community and achieving Garden Community standards.
6.2 Was the broad location for the proposed Garden Community selected on a robust basis?

Response to Inspector’s Issues / Question

6.2.1 Yes. The boundary for the broad location, also referred to as an Area of Search in the LP (MD1), is primarily a rationalisation of the land ownership areas submitted to the Council for consideration through the Housing and Economic Land Availability Assessment (HELAA) (SAD3). This rationalisation results in a ‘rounding off’ of the boundary for the wider area of land the Council have been made aware of. The presence of nearby roads and physical / environmental attributes have also been utilised in setting the area of search, as appropriate.

6.2.2 The approach taken to identify an area of search was justified, proportionate and pragmatic. The selection process is fully explained in responses to Matter 3 and 4 questions. A full summary of the selection decision factors is at Appendix 1 of the Housing Topic Paper (HNS2).

6.2.3 The parts of the broad location to be developed can be subject to much more scrutiny in the preparation of an Area Action Plan (AAP). The LP (MD1 Paras. 33.22 and 33.25) makes it clear that this is not a development boundary and the designation does not yet alter the status of the Green Belt in that area. The entire area and existing settlement is designated as Green Belt and it is important, that in the absence of establishing where the Green Belt boundary will be amended to accommodate the development, no prior assumptions are made.

6.2.4 The inclusion of a broad location within the LP accords with paragraph 47 and 157 of the NPPF 2012 and continues to be supported in the revised NPPF 2019 at paragraphs 23 and 67. Further information regarding the role of the area of search / broad location, is set out at in the LP (MD1 Paras. 33.21 – 33.25).
6.3 Is the proposed broad location in a suitable location for housing development?

Response to Inspector’s Issues / Question

6.3.1 Yes, the Council consider that the broad location presents a suitable location for housing development and indeed the delivery of a new and expanded community.

6.3.2 In its wider consideration of options, the determination of the preferred spatial strategy and the preparation of the Local Plan, the Council has been careful to avoid making premature assumptions. Instead it has carried out a full and comprehensive options appraisal. This has been accompanied by the iterative Sustainability Appraisal process to also inform the content of the Local Plan including the allocation of a broad location at South Godstone (SSHA12). This is further explored in other responses to the Inspector’s questions (including Q 1.4, Q 3.1 and Q 3.2).

6.3.3 In addition, as referenced in the Council’s response to Q 6.4, the Council’s Housing and Economic Land Availability Assessment (HELAA) sets the methodology and criteria upon which ‘suitability’ for housing and other development is established at the basic level. The methodology has been prepared against the requirements of the PPG as well as reflecting local circumstances. In determining the suitability of a broad location, the Council has been pragmatic and proportionate in its approach on reflection of the fact that the garden community is a large-scale and strategic allocation for the longer term which will be considered at a finer grain level in the preparation of the Area Action Plan.

6.3.4 In arriving at the allocation for the broad location at South Godstone, Part 11 of the HELAA (SAD3) details the approach to assessing the suitability of a location as a broad location with three specific tests, including locational factors, the minimum parameters which should be met to be considered as a broad location and an overall consideration of landscape impact.

6.3.5 Beyond the HELAA, other assessments and pieces of research have been carried out to enable the Council to arrive at the final decision in selecting the location for the

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Garden Community, all of which relate to the establishment of its suitability. This includes:

- Spatial Approaches Topic papers (SPS1 and SPS3), which provide yet more detail on the extensive assessment process undertaken and includes a Strengths, Weaknesses, Opportunities and Threats Analysis (SWOT) of the locations which presented original options;

- Air quality impact (ECO4); and

- Landscape Impact (LAN6)

6.3.6 Sufficient evidence has been collated and considered by the Council to demonstrate that the broad location at South Godstone is a suitable location for housing. Further information and detail regarding the development layout and phasing etc will be done through the preparation of the Area Action Plan and this is covered further in the response to Q 6.1.
6.4 How was the proposed broad location defined and is the defined extent justified?

Response to Inspector’s Issues / Question

6.4.1 Yes, the definition / extent is justified as explained in the response to Q 6.2.

6.4.2 It is acknowledged that the level of land being considered is in excess of that needed to meet the requirements of LP Policy SGC01 (MD1). However, this is considered necessary given detailed site constraints such as heritage assets (e.g. ancient woodland and historic landscapes) and the Green Belt boundary details still to be explored and considered at the next stage. The wider area provides sufficient flexibility to work up options for the layout of the community and the area to be developed.

6.4.3 Paragraph 33.23 of the LP states clearly that not all of the land within the Area of Search will be necessary to the delivery of the Garden Community and all the detail regarding the development boundary will be set out in the forthcoming AAP.
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?

Response to Inspector’s Issues / Question

6.5.1 Given the scale of the land which falls within the Area of Search for the Garden Community, it is inevitable that heritage assets, along with ecological and environmental designations of varying types, will exist to some extent. In considering the appropriateness of the broad location to be selected for the Garden Community, desktop and formal assessments were carried out to ensure as many factors as possible were identified and understood in reaching the conclusion.

6.5.2 Consistent consideration and awareness of heritage assets has been achieved through several evidence gathering mechanisms. This influenced the plan and location selection. This includes the Housing and Economic Land Availability Assessments site constraints / suitability evidence (SAD3-13) and detailed constraints information included on a location by location basis during consultation (e.g. SAD13). The landscape and visual assessment work undertaken to assess the garden community locations (LAN6) is particularly relevant. It identifies the presence of a Park Pale boundary which traverses the north and south of the area, as well as some of the more notable heritage assets such as listed buildings. All the issues arising were also considered throughout the Sustainability Appraisal process (SA Objective 3), as detailed in responses to Matter 3 and 4 questions.

6.5.3 Whilst no separate heritage assessment has been carried out, a wider approach; including identification of heritage constraints and implications has been taken. This is appropriate, proportionate and pragmatic at the broad location / areas of search level and is taken in the knowledge that it will be necessary to carry out a series of more specific assessments, including of heritage impacts, as part of AAP preparation.

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Is there evidence that land within the proposed broad location would not be available for development?

Response to Inspector’s Issues / Question

6.6.1 Based on the information available to the Council from direct contact with the various land owners involved (recorded in published evidence - Housing and Economic Land Availability Assessment - HELAA - SAD series of evidence documents) the majority of land within the broad location / area of search, is available for development as a Garden Community. The Council’s understanding that this land is available and promoted for development has been taken as a prerequisite in selection of the broad location.

6.6.2 The land is assessed within the Council’s LP evidence, principally through the HELAA process. This has been done in accordance with the methodology for land availability assessments set out in the PPG and the Council’s HELAA methodology (SAD26). The Council has a rolling call for sites process which has invited promotion of land to be considered for all types of development at any point. The Council has also found Regulation 18 and indeed Regulation 19, stages of consultation beneficial to the detailed understanding of land availability, including where information either confirms the availability of land, adds to existing parcel, or removes land from consideration. The HELAA has been regularly updated and has played a key role in informing of land to be considered for allocation throughout the plan-making process.

6.6.3 SAD13, prepared in 2017, first presented a focused methodology and consideration of potential broad locations and following on from the Council’s establishment of its preferred spatial strategy to include a garden community, in March 2017. This has been further revised in Part 11 of SAD3 (HELAA, 2017-18) and most recently Part 2 of SAD1.

6.6.4 SAD3 presented the information regarding the land availability at the point of the Regulation 19 Local Plan consultation and the map for the Area of Search in the July 2019 iteration of the Local Plan (OTH8, and also MD1) represents a rationalisation of that position (see Q’s 6.2 and 6.4).
6.6.5 Over the course of plan making, the Council has met with landowners and / or their representatives to assist in the understanding of land availability for all reasonable alternatives for the Garden Community. Work is continuing with land owning parties and their representatives in anticipation of the steps that will need to be taken in the preparation of the Area Action Plan. This includes the gathering of information relevant to the submission and further work on the Housing Infrastructure Fund bid, and the Councils' own exploratory work regarding its opportunities to play a role in and facilitate delivery of the development.

6.6.6 Given the scale of the development and the need to further develop options, the Council feel it has been pragmatic in its approach to understanding land availability. No information has been received that would suggest there is insufficient available land, for the requirements of policy SGC01 to be met. As set out in the LP at Para.33.25, the precise boundary for the Garden Community will be developed through the preparation of the AAAP, and it is not envisaged that the entire Area of Search will be required for development of the Garden Community.
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?

Response to Inspector’s Issues / Question

6.7.1 Yes. The Council is mindful of the fact that any development at the scale of circa 4,000 dwellings is likely to require substantial supporting infrastructure such as schools, transport links etc. and South Godstone Garden Community is not unique in this respect.

6.7.2 The Council’s IDP (INF1) sets out the key infrastructure items that need to be delivered to support a Garden Community at this location. The Council has worked with various stakeholders and infrastructure providers to establish these. The IDP makes use of the best available information at that point in time. Since submission of the plan work has continued on the most pressing items, notably road schemes for the Copthorne Hotel Junction (located at Copthorne, Mid Sussex District, West Sussex) and particularly in relation to a bid to the Government Housing Infrastructure Fund (HIF) for A22 junction improvements at J6 of the M25 and the Felbridge Junction.

6.7.3 Not all the infrastructure that has been identified will be in place at the outset of the development. Phasing of infrastructure will be necessary as the Garden Community grows. Infrastructure requirements will continue to be further refined and costed as part of updates to the IDP and through the AAP and the masterplanning process.

6.7.4 The Council has commissioned Consultants to independently test the viability of a Garden Community and the associated infrastructure that would be necessary. This
information is detailed in INF2. Moreover, the Council commissioned has itself commissioned consultants to work with the highway authorities to study the Felbridge Junction, Copthorne Hotel Junction and Junction 6 of the M25, all of which have progressed further since submission of the plan for inspection.

6.7.5 The Council has submitted a bid to the HIF in order to kick start development with investment at junction 6 and the Felbridge junction. There is ongoing dialogue with the DfT, MHCLG and Homes England taking place as part of the rigorous assessment process.

6.7.6 In relation to rail access at Godstone, it is anticipated that the Garden Community development would fund upgrades to the station as part of the development proposals. The Council has met with the DfT, Network Rail and Govia Thameslink Railway to explore delivery.
6.8 When would the proposed Garden Community realistically deliver the first homes? What is the realistic rate of delivery which should be assumed?

Response to Inspector’s Issues / Question

6.8.1 The LP assumption is for 200dpa from 2026/27. This is a well justified and relatively cautious assumption. It is conceivable that, depending on market conditions / demand, a greater dwelling yield might be achieved; in the order of 270dpa. The detail of these assumptions is set out in published evidence (HNS2 Appendices 3/4 and SAD2). Direct public sector (potentially Council led) involvement in the development is being actively considered and this would assist in accelerating delivery, especially by leading comprehensive land acquisition and land value equalisation.
6.9 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?

Response to Inspector’s Issues / Question

6.9.1 Yes, this is the most effective way of proceeding and is necessary and appropriate. Affordable housing subsidy is a very significant factor in housing development viability, even in an area with a buoyant housing market (INF15). The AAP work will allow the Council’s policies for affordable housing for SGGC to be defined in a realistic way, to specifically reflect further detailed work on viability, particularly taking account of the level of start-up infrastructure costs. This includes understanding the outcome of the current HIF bid and finalisation of the method of delivery. HIF success and potential direct public sector / Council involvement in the development should create greater viability ‘headroom’ for affordable housing, but this position cannot be assumed for the LP. SGGC viability evidence (INF2 Section 4) currently considers different levels of affordable housing provision.
6.10 **Are the proposed Modifications necessary for soundness?**

**Response to Inspector’s Issues / Question**

6.10.1 Some are. These are those proposed modifications initially set out in the submission Examination Library Document MD16 - 2019 and then reproduced in Part 1 Schedule of Proposed Main Modifications (Submitted January 2019) of Examination Document TED01 (prepared as part of the Council’s response to the Inspector’s initial questions (ID 2 and 3).

6.10.2 The Council’s view is that the remaining proposed modifications to SGC01 do not go to the soundness of the Plan (these are proposed other or minor modifications identified through tracked changes in Examination Library Document MD1 - the Publication ‘Our Local Plan:2033’). The modifications are only suggested for the benefit of clarity / consistency with the wider plan and to assist in the interpretation of the policy. The intent and use of the policy is not altered by these modifications.

6.10.3 That said, as set out in Examination Document TED01 (prepared as part of the Council’s response to the Inspector’s initial questions (ID 2 and 3), it is accepted that an alternative interpretation, as to whether some of the Council’s proposed other / minor modifications constitute a main modification, could exist. All of the proposed modifications to SGC01 have therefore been highlighted as a potential main modification in TED01/02 (Part 2 – Proposed modifications originally categorised as proposed minor modifications (May 2019).

**Evidence**

ECO4 – Tandridge Local Plan 2033 Air Quality Impact Assessment Specific attention on the Garden Village Schemes 2018

HNS2 – Tandridge Local Plan 2033 Housing Topic Paper 2019

INF1 – Tandridge District Infrastructure Delivery Plan 2019

*Document Reference TED10: Tandridge District Council Hearing Statement Matter 6*
INF2 – Tandridge District South Godstone Garden Community Financial Viability Assessment 2018

INF15 – Tandridge Draft Local Plan Viability Assessment 2018

LAN6 – Tandridge District Landscape and Visual Assessment Concept Areas for New and Extended Settlements 2016

MD1 – Our Local Plan 2033 Submission 2019

MD16 – Schedule of Proposed Main Modifications 2019

OTH8 – Regulation 19 Consultation Our Local Plan 2033 Untracked Version 2019

SAD1 – Housing and Economic Land Availability Assessment Interim Report 2019

SAD2 – Garden Community Delivery Approaches Briefing Note 2018

SAD3 – Housing and Economic Land Availability Assessment 2017-2018

SAD13 – Interim Focused Housing and Economic Land Availability Assessment Broad Locations 2017

SAD26 – Tandridge Local Plan Housing and Economic Land Availability Assessment Methodology 2015

SPS1 – Spatial Approaches Topic Paper Garden Villages Consultation 2017

SPS3 – Spatial Approaches Topic Paper Sites Consultation 2016

SSHA12 – Sustainability Appraisal for Tandridge District Regulation 18 Potential Garden Village Locations 2017

TED01 – Schedule of Proposed Main Modifications (May 2019)

TED02 – Response to Inspector Documents ID2 and 3

Supporting Papers

None

Document Reference TED10:
Tandridge District Council Hearing Statement Matter 6
Housing allocations

Issue: Are the proposed housing allocations justified, effective and consistent with national policy?
6.11 What are the exceptional circumstances for the release of the site from the Green Belt?

Response to Inspector’s Issues / Question

6.11.1 The Council considers that there are exceptional circumstances that warrant release of this site from the Green Belt (GB1 and GB2).

6.11.2 The following table summarises the Council’s conclusions in relation to this site’s performance in relation to the four key Green Belt purposes.

| Purpose 1 | To check unrestricted sprawl of large built-up areas | Moderate |
| Purpose 2 | To prevent neighbouring towns merging into one another | Relatively Weak |
| Purpose 3 | To assist in safeguarding the countryside from encroachment | Moderate |
| Purpose 4 | To preserve the setting and special character of historic towns | Weak |

6.11.3 This site is considered to meet only two of the Green Belt purposes and is considered to perform relatively weakly overall against all four purposes in combination.

6.11.4 This site has been identified as being able to contribute towards benefits above and beyond any needed to off-set impacts associated with its development, contributing to wider community benefits such as local flood alleviation measures and local highway improvements.

6.11.5 Together these factors are considered to represent the exceptional circumstances needed to justify the release of this site from the Green Belt.
6.12 Is the proposed Green Belt boundary justified and consistent with national policy as set out in paragraph 85 of the Framework?

Response to Inspector’s Issues / Question

6.12.1 Yes. The Council considers that the Green Belt boundary is justified. The Green Belt boundaries comprise a track and intermittent trees to the south and a hedge along the east. It is considered that the Green Belt boundaries are readily recognisable and reasonably permanent, but the Council recognises that they will need to be reinforced and the use of appropriate design and layout of the site will further ensure the Green Belt boundaries comply with Para.85. An appropriately worded condition has been included within the policy to secure this.
6.13 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? Would the requirement to explore opportunities for junction improvements at Plough Road/Redehall Road/Chapel Road/Wheelers Lane be effective and is it justified? Is it effective to require the provision of amenity green space in accordance with the ‘most up to date open space assessment’ when it is not part of the development plan?

Response to Inspector’s Issues / Question

6.13.1 Yes. The Council considers the infrastructure requirements as set out in the policy to be reasonable and related in scale and kind to the site, based on geographical proximity and the known infrastructure provision in the immediate vicinity of the site. Furthermore, the Plough Road junction in Smallfield becomes congested at peak times and during school drop off as such any development in Smallfield is likely to have some impact on the centre of the village. It is justified to seek to mitigate for this impact so far as is possible in a constrained part of the village.
6.14 Are there any matters which would mean that the site should not be considered to be deliverable or developable as per footnotes 11 and 12 to the Framework?

Response to Inspector’s Issues / Question

6.14.1 No. The site is located adjacent to the settlement boundary of Smallfield, a Tier 2 settlement, and as such is in a suitable location for housing development. The site comprises of three HELAA sites which have been combined to form HSG01, and each site (SMA 004, SMA 008 and SMA 040) was assessed as being developable in the HELAA 2017-2018 Appendix 3 Deliverable and Developable Sites (SAD6). The Council is not aware of any matters which would mean the site could not viably be developed at the point envisaged.
6.15 Are the proposed Modifications necessary for soundness?

Response to Inspector's Issues / Question

6.15.1 Some are. These are those proposed modifications initially set out in the submission Examination Library Document MD16 - 2019 and then reproduced in Part 1 Schedule of Proposed Main Modifications (Submitted January 2019) of Examination Document TED01 (prepared as part of the Council's response to the Inspector’s initial questions (ID 2 and 3).

6.15.2 The Council's view is that the remaining proposed modifications to HSG01 do not go to the soundness of the Plan (these are proposed other or minor modifications identified through tracked changes in Examination Library Document MD1 - the Publication 'Our Local Plan:2033’). The modifications are only suggested for the benefit of clarity / consistency with the wider plan and to assist in the interpretation of the policy. The intent and use of the policy is not altered by these modifications.

Evidence

GB1 – Green Belt Assessment (Part 3) Exceptional Circumstances and Insetting 2018
GB2 – Green Belt Assessment (Part 3) Appendix 1 2018
MD1 – Our Local Plan 2033 Submission 2019
MD16 – Schedule of Proposed Main Modifications 2019
SAD6 – Housing and Economic Land Availability Assessment 2017-2018 Appendix 3 Deliverable and Developable Sites
TED01 – Schedule of Proposed Main Modifications (May 2019)

Supporting Papers

None

Document Reference TED10: Tandridge District Council Hearing Statement Matter 6
HSG02: Chapel Road, Smallfield

6.16 In terms of flood risk, is the allocation of the site justified in respect of the Sequential Test and the Exceptions Test? Has it been demonstrated that a housing development at the site would be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere?

Response to Inspector’s Issues / Question

6.16.1 Yes. The Council considers the allocation of the site justified in respect of the Sequential Test and the Exceptions Test. The Council commissioned a Strategic Flood Risk Assessment (Levels 1 and 2) (WTR 3 – WTR 13), which was used to apply the Sequential Test and Exceptions Test, as detailed in the Flood Risk and The Development Allocations – Site Selection Process (WTR1).

6.16.2 The Council considers that the site-specific information contained within the SFRA (Level 2) provides sufficient information to demonstrate that a housing development at this site could be designed to be safe for its lifetime.

6.16.3 Furthermore, applications for the development of this site will have to be accompanied by a site-specific Flood Risk Assessment and will need to respond to all sources of flooding as required by policy HSG02 clause I. Moreover, any application will be considered against policy TLP47, which states:

‘In areas at risk of flooding development should be safe for the lifetime of the development and should flood resilience and resistant measures into the design, layout and form of buildings to reduce the level of flood risk both on site and elsewhere.’

6.16.4 The Council considers that policy TLP47 will ensure that development on this will be safe for its lifetime. In addition, it is considered that this policy will ensure that flood risk elsewhere will not increase and provides the opportunity for betterment.

6.16.5 As such the Council is satisfied that this site can be developed and would be safe for its lifetime, without increasing flood risk elsewhere.

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6.17 Are there any constraints which would mean that the site should not be considered to be deliverable or developable as per footnotes 11 and 12 to the Framework?

Response to Inspector’s Issues / Question

6.17.1 No. The site is previously developed and located within the settlement boundary of Smallfield, a Tier 2 settlement, and as such is in a suitable location for housing development. The site was submitted to the HELAA (reference SMA015) and was assessed as being deliverable in SAD6. The Council is not aware of any reason for the site not to be considered achievable and viable, with a realistic prospect that housing will be delivered on the site within five years.
6.18 Are the requirements for financial contributions consistent with national policy for planning obligations and conditions as set out in the Framework?

Response to Inspector's Issues / Question

6.18.1 Yes. The Council considers the infrastructure requirements as set out in the policy to be reasonable and related in scale and kind to the site, based on geographical proximity and the known infrastructure provision in the immediate vicinity of the site.

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6.19 Are the proposed Modifications necessary for soundness?

Response to Inspector's Issues / Question

6.19.1 Some are. These are those proposed modifications initially set out in the submission Examination Library Document MD16 - 2019 and then reproduced in Part 1 Schedule of Proposed Main Modifications (Submitted January 2019) of Examination Document TED01 (prepared as part of the Council's response to the Inspector's initial questions (ID 2 and 3).

6.19.2 The Council's view is that the remaining proposed modifications to HSG02 do not go to the soundness of the Plan (these are proposed other or minor modifications identified through tracked changes in Examination Library Document MD1 - the Publication ‘Our Local Plan:2033’). The modifications are only suggested for the benefit of clarity / consistency with the wider plan and to assist in the interpretation of the policy. The intent and use of the policy is not altered by these modifications.

Evidence

MD1 – Our Local Plan 2033 Submission 2019
MD16 – Schedule of Proposed Main Modifications 2019
SAD6 – Housing and Economic Land Availability Assessment 2017-2018 Appendix 3 Deliverable and Developable Sites
TED01 – Schedule of Proposed Main Modifications (May 2019)
WTR1 – Flood Risk Sequential and Exception Test 2019
WTR3 – Tandridge District Level 2 Strategic Flood Risk Assessment 2018
WTR4 – Tandridge District Level 2 Strategic Flood Risk Assessment Detailed Site Summary Tables Appendix A 2018
WTR5 – Tandridge District Level 2 Strategic Flood Risk Assessment Catchment Summary Tables Appendix B 2018

Document Reference TED10:
Tandridge District Council Hearing Statement Matter 6
WTR6 – Tandridge District Level 2 Strategic Flood Risk Assessment Garden Community Summary Tables Appendix C

WTR7 – Tandridge District Level 2 Strategic Flood Risk Assessment Detailed Site Summary Table Appendix D CAT 007 Map 2018

WTR8 – Tandridge District Level 2 Strategic Flood Risk Assessment Detailed Site Summary Table Appendix E Caterham and Whyteleafe Map 2018

WTR9 – Tandridge District Level 2 Strategic Flood Risk Assessment Detailed Site Summary Table Appendix E Caterham on the Hill Map 2018

WTR10 - Tandridge District Level 2 Strategic Flood Risk Assessment Detailed Site Summary Table Appendix E Smallfield Map 2018

WTR11 - Tandridge District Level 2 Strategic Flood Risk Assessment Detailed Site Summary Table Appendix F Blindley Heath Map 2018

WTR12 - Tandridge District Level 2 Strategic Flood Risk Assessment Detailed Site Summary Table Appendix F Redhill Aerodrome Map 2018

WTR13 - Tandridge District Level 2 Strategic Flood Risk Assessment Detailed Site Summary Table Appendix F South Godstone Map 2018

Supporting Papers

None
HSG03: Land North of Plough Road, Smallfield

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

Response to Inspector’s Issues / Question

6.20.1 The Council considers that there are exceptional circumstances that warrant release of this site from the Green Belt (GB1 and GB2).

6.20.2 The following table summarises the Council’s conclusions in relation to this site’s performance in relation to the four key Green Belt purposes.

| Purpose 1 | To check unrestricted sprawl of large built-up areas | Relatively Strong |
| Purpose 2 | To prevent neighbouring towns merging into one another | Relatively Weak |
| Purpose 3 | To assist in safeguarding the countryside from encroachment | Moderate |
| Purpose 4 | To preserve the setting and special character of historic towns | Weak |

6.20.3 This site is considered to meet only two of the Green Belt purposes and is considered to perform relatively weakly overall against all four purposes in combination.

6.20.4 This site has been identified as being able to contribute towards benefits above and beyond any needed to off-set impacts associated with its development, contributing to wider community benefits such as local flood alleviation measures and highway improvements. This is an exceptional opportunity for implementing a flood relief scheme identified in liaison with the Environment Agency.

6.20.5 Together these factors are considered to represent the exceptional circumstances needed to justify the release of this site from the Green Belt.
6.21 Is the proposed Green Belt boundary justified and consistent with national policy as set out in paragraph 85 of the Framework?

Response to Inspector’s Issues / Question

6.21.1 Yes. The Council considers that the boundary is justified. The Green Belt boundaries comprise small hedges with intermittent trees. It is recognised that this site contributes towards openness and the Council recognises that the boundaries will need to be enhanced and reinforced. The use of appropriate design and layout of the site will ensure the Green Belt boundaries comply with paragraph 85. An appropriately worded condition in the policy has been included to secure this.
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? Would the requirement to explore opportunities for junction improvements at Plough Road/Redehall Road/Chapel Road/Wheelers Lane be effective and is it justified? Is it justified to seek a financial contribution to Plough Field Park Youth provision?

Response to Inspector’s Issues / Question

Yes. The Council considers the infrastructure requirements as set out in the policy to be reasonable and related in scale and kind to the site, based on geographical proximity and the known infrastructure provision in the immediate vicinity of the site. There is an identified need for youth provision within the Smallfield area, which this site could reasonably contribute towards. Furthermore, the Plough Road junction in Smallfield becomes congested at peak times and during school drop off as such any development in Smallfield is likely to have some impact on the centre of the village. It is justified to seek to mitigate for this impact so far as is possible in a constrained part of the village.
6.23 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 to Inspector’s Issues / Question

6.23.1 No. The site is located adjacent to the settlement boundary of Smallfield, a Tier 2 settlement, and as such is in a suitable location for housing development. The site was submitted to the HELAA (reference SMA 030) and was assessed as being developable in SAD6. The Council is not aware of any matters which would mean the site could not viably be developed at the point envisaged.

6.23.2 In addition, and as highlighted in the developers Regulation 19 representation, the Council is aware of engagement by the agent with EA and SCC regarding the provision of a flood attenuation facility as part of the development of the site. The developer highlights in Para.33.17 of their representation that the proposed alleviation works would be developer funded and they have included provision for this within the Development Brief submitted as part of their Regulation 19 submission. The developer states that the flood alleviation would be undertaken alongside the housing development and would therefore not adversely affect the deliverability of the scheme as a whole. The site allocation is required in order to facilitate the flood alleviation scheme, which would both enable development within Smallfield and provide wider community benefits. This community benefit contributes to the exceptional circumstances for release of the site from the Green Belt.

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Tandridge District Council Hearing Statement Matter 6

34
6.24 Are the proposed Modifications necessary for soundness?

Response to Inspector’s Issues / Question

6.24.1 No. The Council’s view is that the proposed modifications to HSG03 do not go to the soundness of the Plan (these are proposed other or minor modifications identified through tracked changes in Examination Library Document MD1 - the Publication ‘Our Local Plan:2033’). The modifications are only suggested for the benefit of clarity / consistency with the wider plan and to assist in the interpretation of the policy. The intent and use of the policy is not altered by these modifications.

Evidence

GB1 – Green Belt Assessment (Part 3) Exceptional Circumstances and Insetting 2018
GB2 – Green Belt Assessment (Part 3) Appendix 1 2018
MD1 – Our Local Plan 2033 Submission 2019
SAD6 – Housing and Economic Land Availability Assessment 2017-2018 Appendix 3 Deliverable and Developable Sites

Supporting Papers
None

Document Reference TED10:
Tandridge District Council Hearing Statement Matter 6
HSG04: Woodlands Garage, Chapel Road, Smallfield

6.25 In terms of flood risk, is the allocation of the site justified in respect of the Sequential Test and the Exceptions Test? Has it been demonstrated that a housing development at the site would be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere?

Response to Inspector’s Issues / Question

6.25.1 Yes. The Council considers the allocation of the site justified in respect of the Sequential Test and the Exceptions Test. The Council commissioned a Strategic Flood Risk Assessment (Levels 1 and 2) (WTR 3 – WTR 13), which was used to apply the Sequential Test and Exceptions Test, as detailed in the Flood Risk and The Development Allocations – Site Selection Process (WTR1).

6.25.2 The Council considers that the site-specific information contained within the SFRA (Level 2) provides sufficient information to demonstrate that a housing development at this site could be designed to be safe for its lifetime. This conclusion is supported by the granting of planning permission for residential development under reference 2017/2311.

6.25.3 Furthermore, applications for the development of this site will have to be accompanied by a site-specific Flood Risk Assessment and will need to respond to all sources of flooding as required by policy HSG04 clauses I and II. Moreover, any application will be considered against policy TLP47, which states:

   ‘In areas at risk of flooding development should be safe for the lifetime of the development and should flood resilience and resistant measures into the design, layout and form of buildings to reduce the level of flood risk both on site and elsewhere.’

6.25.4 The Council considers that policy TLP47 will ensure that development on this will be safe for its lifetime. In addition, it is considered that this policy will ensure that flood risk elsewhere will not increase and provides the opportunity for betterment.
6.25.5 As such the Council is satisfied that this site can be developed and would be safe for its lifetime, without increasing flood risk elsewhere.
6.26 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 to Inspector’s Issues / Question

6.26.1 No. The site, which is previously developed and within the built-up area of Smallfield, has been granted permission for 10 dwellings on 20 September 2018, under planning application reference 2017/2311. The site therefore has planning permission for development and is considered to be deliverable.

6.26.2 It is noted that a further application, reference 2019/638 for 10 dwellings, but which now also includes a retail unit, has since been submitted but is as yet undetermined. The supporting information submitted with the new application does not identify any viability issues with the previous scheme, but simply represents a potential opportunity to achieve a mixed-use development on this former commercial site.
6.27 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?

Response to Inspector’s Issues / Question

6.27.1 Yes. The Council considers the infrastructure requirements as set out in the policy to be reasonable and related in scale and kind to the site, based on geographical proximity and the known infrastructure provision in the immediate vicinity of the site.
6.28 Are the proposed Modifications necessary for soundness?

Response to Inspector’s Issues / Question

6.28.1 Some are. These are those proposed modifications initially set out in the submission Examination Library Document MD16 - 2019 and then reproduced in Part 1 Schedule of Proposed Main Modifications (Submitted January 2019) of Examination Document TED01 (prepared as part of the Council’s response to the Inspector’s initial questions (ID 2 and 3).

6.28.2 The Council’s view is that the remaining proposed modifications to HSG04 do not go to the soundness of the Plan (these are proposed other or minor modifications identified through tracked changes in Examination Library Document MD1 - the Publication ‘Our Local Plan:2033’). The modifications are only suggested for the benefit of clarity / consistency with the wider plan and to assist in the interpretation of the policy. The intent and use of the policy is not altered by these modifications.

Evidence
MD1 – Our Local Plan 2033 Submission 2019
MD16 – Schedule of Proposed Main Modifications 2019
SAD6 – Housing and Economic Land Availability Assessment 2017-2018 Appendix 3 Deliverable and Developable Sites
TED01 – Schedule of Proposed Main Modifications (May 2019)
WTR1 – Flood Risk Sequential and Exception Test 2019
WTR3 – Tandridge District Level 2 Strategic Flood Risk Assessment 2018
WTR4 – Tandridge District Level 2 Strategic Flood Risk Assessment Detailed Site Summary Tables Appendix A 2018
WTR5 – Tandridge District Level 2 Strategic Flood Risk Assessment Catchment Summary Tables Appendix B 2018

Document Reference TED10:
Tandridge District Council Hearing Statement Matter 6
WTR6 – Tandridge District Level 2 Strategic Flood Risk Assessment Garden Community Summary Tables Appendix C

WTR7 – Tandridge District Level 2 Strategic Flood Risk Assessment Detailed Site Summary Table Appendix D CAT 007 Map 2018

WTR8 – Tandridge District Level 2 Strategic Flood Risk Assessment Detailed Site Summary Table Appendix E Caterham and Whyteleafe Map 2018

WTR9 – Tandridge District Level 2 Strategic Flood Risk Assessment Detailed Site Summary Table Appendix E Caterham on the Hill Map 2018

WTR10 - Tandridge District Level 2 Strategic Flood Risk Assessment Detailed Site Summary Table Appendix E Smallfield Map 2018

WTR11 - Tandridge District Level 2 Strategic Flood Risk Assessment Detailed Site Summary Table Appendix F Blindley Heath Map 2018

WTR12 - Tandridge District Level 2 Strategic Flood Risk Assessment Detailed Site Summary Table Appendix F Redhill Aerodrome Map 2018

WTR13 - Tandridge District Level 2 Strategic Flood Risk Assessment Detailed Site Summary Table Appendix F South Godstone Map 2018

Supporting Papers

None
HSG05: Sandiford House, 40 Stanstead Road, Caterham

6.29 Would the proposed allocation give rise to a net increase in homes?

Response to Inspector’s Issues / Question

6.29.1 Yes. The proposed allocation HSG05: Sandiford House, 40 Stanstead Road, Caterham is anticipated to give rise to a net increase in homes. The site was identified as an urban capacity site from a pre-application enquiry for the redevelopment of the site to provide 15 specialist housing units. This is denoted in the Local Plan evidence-base, SBC3 page 1.

6.29.2 In 2017, post-publication of SBC3, a planning application (2017/2310) was submitted to the Council and later withdrawn from the planning application process. The proposal included the demolition of the existing building (Use Class C2) and erection of a replacement building comprising 14 units to the rear of the site. In addition to this, the applicant proposed to erect a residential building (Use Class C3) comprising 14 units to the front of the site. This would give rise to a net increase in homes and at the point for Regulation 19 and submission, represented the site position.

6.29.3 The Council notes that a subsequent planning application has since been submitted to the Council in relation to this site. Planning application reference 2019/82 was submitted in January 2019 and later refused in June of this year. The proposal would involve retaining the existing building (Use Class C2) and erection of a terrace of dwelling houses comprising 4 residential units (Use Class C3). Although the proposed number of units from this planning application is significantly lower to the proposed allocation in the emerging plan, it will nonetheless give rise to a net increase in 4 homes.
6.30 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 to Inspector’s Issues / Question

6.30.1 No. The site is previously developed and within the built-up area of Caterham, a Tier 1 settlement, and is available now.

6.30.2 There have been recent planning applications on this site, the first (reference 2017/2310) for a total of 28 units on the site (a gain of 14 units) which was withdrawn. A more recent application (reference 2019/82) for a terrace of 4 dwellinghouses to the rear of the site, whilst retaining the existing flats, was refused in June this year. The application was refused at Committee on the grounds of impact of the character of the site and surrounding area, but also harm to the residential amenity of the existing residents at Sandiford House due to the location of the access road.

6.30.3 Despite the fact that permission has yet to be obtained on this site it is considered that there is a realistic prospect that housing will be delivered on the site within five years and that development of the site is viable.
6.31 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?

Response to Inspector's Issues / Question

6.31.1 Yes. The Council considers the infrastructure requirements as set out in the policy to be reasonable and related in scale and kind to the site, based on geographical proximity and the known infrastructure provision in the immediate vicinity of the site.
6.32 Are the proposed Modifications necessary for soundness?

Response to Inspector’s Issues / Question

6.32.1 Some are. These are those proposed modifications initially set out in the submission Examination Library Document MD16 - 2019 and then reproduced in Part 1 Schedule of Proposed Main Modifications (Submitted January 2019) of Examination Document TED01 (prepared as part of the Council’s response to the Inspector’s initial questions (ID 2 and 3).

6.32.2 The Council’s view is that the remaining proposed modifications to HSG05 do not go to the soundness of the Plan (these are proposed other or minor modifications identified through tracked changes in Examination Library Document MD1 - the Publication ‘Our Local Plan:2033’). The modifications are only suggested for the benefit of clarity / consistency with the wider plan and to assist in the interpretation of the policy. The intent and use of the policy is not altered by these modifications.

Evidence

MD1 – Our Local Plan 2033 Submission 2019
MD16 – Schedule of Proposed Main Modifications 2019
SBC3 – Tandridge District Council Urban Capacity Study Appendix A Site Search 2017
TED01 - Schedule of Proposed Main Modifications (May 2019)

Supporting Papers

None
HSG06: Land off Salmons Lane West, Caterham

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

Response to Inspector’s Issues / Question

6.33.1 The Council considers that there are exceptional circumstances that warrant release of this site from the Green Belt (GB1 and GB2).

6.33.2 The following table summarises the Council’s conclusions in relation to this site’s performance in relation to the four key Green Belt purposes.

<table>
<thead>
<tr>
<th>Purpose 1</th>
<th>To check unrestricted sprawl of large built-up areas</th>
<th>Weak</th>
</tr>
</thead>
<tbody>
<tr>
<td>Purpose 2</td>
<td>To prevent neighbouring towns merging into one another</td>
<td>Moderate</td>
</tr>
<tr>
<td>Purpose 3</td>
<td>To assist in safeguarding the countryside from encroachment</td>
<td>Relatively Weak</td>
</tr>
<tr>
<td>Purpose 4</td>
<td>To preserve the setting and special character of historic towns</td>
<td>Strong</td>
</tr>
</tbody>
</table>

6.33.3 This site is considered to meet only two of the Green Belt purposes and is considered to perform relatively weakly overall against all four purposes in combination.

6.33.4 This site has been identified as being able to contribute towards benefits above and beyond any needed to off-set impacts associated with its development, contributing to wider community benefits such as limited development of this site, which is currently vacant and in a derelict condition, which could ensure the heritage assets and where relevant their setting, are preserved and enhanced. The approach taken in the policy is reflective of the special heritage issues for the site.

6.33.5 Together these factors are considered to represent the exceptional circumstances needed to justify the release of this site from the Green Belt.
6.34 Is the proposed Green Belt boundary justified and consistent with national policy as set out in paragraph 85 of the Framework?

Response to Inspector’s Issues / Question

6.34.1 Yes. The Council considers that the site boundary is justified. The Green Belt boundary along the eastern side of the site is well defined by trees. To the north of the site it is defined by fencing. It is considered that the Green Belt boundaries are readily recognisable and reasonably permanent, but the Council recognises that they will need to be reinforced and the appropriate design and layout of the site will further ensure the Green Belt boundaries comply with Para.85. An appropriately worded condition within the policy has been included to secure this.
6.35 What is the significance of the heritage assets at the former RAF Kenley Aerodrome? Where is the evidence that the potential effect on the heritage assets or their settings which may result from the proposed development has been assessed?

Response to Inspector’s Issues / Question

6.35.1 RAF Kenley Aerodrome is designated as two separate but abutting Conservation Areas. The Conservation Area extends across both Tandridge’s and Croydon Borough Council's administrative areas. It includes 10 Scheduled Monuments (within Croydon Council’s administrative area) and 2 Grade II listed buildings (within Tandridge’s administrative area). It significance lies in the fact that it was one of the key fighter stations associated with the Battle of Britain and it is one of the most complete fighter airfields to have survived. The Kenley Aerodrome Conservation Area Proposals Statement SPD defines the special interest and townscape of the area.

6.35.2 The Local Plan has considered the various heritage assets and their setting throughout the process and the evidence for this can be found in different parts of the evidence-base. This includes the Council’s initial assessment as to the site's suitability, availability and achievability through its Housing and Employment Land Availability Assessment (SAD1, SAD3 – SAD11) and the Tandridge Landscape Capacity and Sensitivity Study (October 2016) (LAN22). In addition, the Sustainability Appraisal requires assessment against SA objective 3: To conserve and enhance archaeological, historic and cultural assets and as such this site has been assessed iteratively in terms of the heritage assets, the potential impact upon them and potential mitigation measures as part of the SA process (SSHA3 and SSHA16).

6.35.3 The Council considers that, throughout the process, regard has been had to the potential effect on heritage assets or their setting and that the policy has been appropriately worded to ensure that heritage focus is a key factor of any scheme. The Council's response to Q 6.38 identifies further modifications, for consideration by the Inspector, which would strengthen the focus on heritage, but still allow for the housing development proposed.
6.36 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 to Inspector’s Issues / Question

6.36.1 Yes. The Council considers the infrastructure requirements as set out in the policy to be reasonable and related in scale and kind to the site, based on geographical proximity and the known infrastructure provision in the immediate vicinity of the site.
6.37 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 to Inspector’s Issues / Question

6.37.1 No. The site is located adjacent to the settlement boundary of Caterham, a Tier 1 settlement, and as such is in a suitable location for housing development. The site was submitted to the HELAA (reference CAT 040) and was assessed as being developable in SAD6. The Council is not aware of any matters which would mean the site could not viably be developed at the point envisaged.
6.38 Are the proposed Modifications necessary for soundness?

Response to Inspector's Issues / Question

6.38.1 Some are. These are those proposed modifications initially set out in the submission Examination Library Document MD16 - 2019 and then reproduced in Part 1 Schedule of Proposed Main Modifications (Submitted January 2019) of Examination Document TED01 (prepared as part of the Council's response to the Inspector's initial questions (ID 2 and 3).

6.38.2 The Council's view is that the remaining proposed modifications to HSG06 do not go to the soundness of the Plan (these are proposed other or minor modifications identified through tracked changes in Examination Library Document MD1 - the Publication ‘Our Local Plan:2033’). The modifications are only suggested for the benefit of clarity / consistency with the wider plan and to assist in the interpretation of the policy. The intent and use of the policy is not altered by these modifications.

6.38.3 That said, as set out in Examination Document TED01 (prepared as part of the Council's response to the Inspector's initial questions (ID 2 and 3), it is accepted that an alternative interpretation, as to whether some of the Council's proposed other / minor modifications constitute a main modification, could exist. All of the proposed modifications to HSG06 have therefore been highlighted as a potential main modification in TED01/02 (Part 2 – Proposed modifications originally categorised as proposed minor modifications (May 2019)

Evidence

GB1 – Green Belt Assessment (Part 3) Exceptional Circumstances and Insetting 2018
GB2 – Green Belt Assessment (Part 3) Appendix 1 2018
LAN22 – Tandridge Landscape Capacity and Sensitivity Study Whyteleafe 2016
MD1 – Our Local Plan 2033 Submission 2019
MD16 – Schedule of Proposed Main Modifications 2019

Document Reference TED10:
Tandridge District Council Hearing Statement Matter 6
SAD1 – Housing and Economic Land Availability Assessment Interim Report 2019
SAD3 – Housing and Economic Land Availability Assessment 2017-2018
SAD4 – Housing and Economic Land Availability Assessment 2017-2018 Appendix 1 Acronyms Used
SAD5 – Housing and Economic Land Availability Assessment 2017-2018 Appendix 2 Viability Report
SAD6 – Housing and Economic Land Availability Assessment 2017-2018 Appendix 3 Deliverable and Developable Sites
SAD7 – Housing and Economic Land Availability Assessment 2017-2018 Appendix 4 Unsuitable and Unavailable Sites
SAD8 – Housing and Economic Land Availability Assessment 2017-2018 Appendix 5 Tandridge Landowner Survey 2016
SAD9 – Housing and Economic Land Availability Assessment 2017-2018 Appendix 6 Employment Sites
SAD10 – Housing and Economic Land Availability Assessment 2017-2018 Appendix 7 Traveller Sites
SAD11 – Housing and Economic Land Availability Assessment 2017-2018 Appendix 8 Additional Sites for consideration
SSHA3 – Tandridge Local Plan Sustainability Appraisal Regulation 19 Stage Volume 2 Options Assessment 2018
SSHA16 – Sustainability Appraisal for Tandridge District Regulation 18 Sites Consultation 2016
TED01 - Schedule of Proposed Main Modifications (May 2019)
TED02 – Response to Inspector Documents ID2 and 3
The Kenley Aerodrome Conservation Area Proposals Statement SPD

**Supporting Papers**
None

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**Document Reference TED10:**
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HSG07: Coulsdon Lodge, Coulsdon Road, Caterham

6.39  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 to Inspector’s Issues / Question

6.39.1 No. The site is located within the built-up area of Caterham, a Tier 1 settlement, and as such is in a suitable location for housing development. The building was formerly used as a Care Home but has been vacant since 2013. The site was submitted to the HELAA (reference CAT 081) and was assessed as being deliverable in SAD6.

6.39.2 The Council is not aware of any reason for the site not to be considered achievable and viable, with a realistic prospect that housing will be delivered on the site within five years.
6.40 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 to Inspector’s Issues / Question

6.40.1 Yes. The Council considers the infrastructure requirements as set out in the policy to be reasonable and related in scale and kind to the site, based on geographical proximity and the known infrastructure provision in the immediate vicinity of the site.
6.41 Are the proposed Modifications necessary for soundness?

Response to Inspector's Issues / Question

6.41.1 Some are. These are those proposed modifications initially set out in the submission Examination Library Document MD16 - 2019 and then reproduced in Part 1 Schedule of Proposed Main Modifications (Submitted January 2019) of Examination Document TED01 (prepared as part of the Council’s response to the Inspector’s initial questions (ID 2 and 3).

6.41.2 The Council’s view is that the remaining proposed modifications to HSG07 do not go to the soundness of the Plan (these are proposed other or minor modifications identified through tracked changes in Examination Library Document MD1 - the Publication ‘Our Local Plan:2033’). The modifications are only suggested for the benefit of clarity / consistency with the wider plan and to assist in the interpretation of the policy. The intent and use of the policy is not altered by these modifications.

Evidence

MD1 – Our Local Plan 2033 Submission 2019

MD16 – Schedule of Proposed Main Modifications 2019

SAD6 – Housing and Economic Land Availability Assessment 2017-2018 Appendix 3 Deliverable and Developable Sites

TED01 - Schedule of Proposed Main Modifications (May 2019)

Supporting Papers

None
HSG08: 156-180 Whyteleafe Road, Caterham

6.42 In character and appearance terms, would a site access from Whyteleafe Road be justified?

Response to Inspector’s Issues / Question

6.42.1 This site has been the subject of a number planning applications. A scheme for 59 dwellings was refused permission in 2016 (2016/1649); the related appeal (APP/M3645/W/16/2164394) is relevant. The Inspector concluded that the access would have a harmful impact on the character and appearance of Whyteleafe Road.

6.42.2 In coming to this conclusion, the Inspector considered the scale and location of the access (involving the demolition of number 172 Whyteleafe Road), the resulting gap in the frontage and the relationship with an access serving 10 dwellings (located between numbers 168 and 170 Whyteleafe Road) permitted under reference (2015/2263).

6.42.3 The Inspector considered that it would result in number 170 being in an ‘isolated and disjointed position, sitting uncomfortably between two estate accesses. The dwelling would appear disconnected from others in the street and the result would be incongruous and interrupt the general pattern, rhythm and grain of development along the street.’ (Paras. 11 and 12).

6.42.4 In essence, whilst acknowledging that gaps in the frontage were a recent and increasing characteristic in the street scene, it was the proliferation of those access points in such close proximity which the Inspector considered would undermine the prevailing character of the area and diminish the quality of the environment. However, the Inspector (Para.16) also notes that, based on the evidence, the proposed access was not the only viable solution to accessing the site.

6.42.5 A Certificate of Lawfulness (2019/1023) has been submitted, which seeks to demonstrate that the scheme for 10 dwellings, permitted under reference 2015/2263, has been implemented, but this is undetermined. However, recent applications, whilst

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sub-dividing this site, have demonstrated that it could be developed without resulting in the harm identified by the Planning Inspector. One (2019/38) utilised the access serving 2015/2263 (itself subject to a recent application), whilst 2018/2445, was accessed via Annes Walk.

6.42.6 These two schemes (2019/38 and 2018/2445) have been refused permission, however they were not refused permission on grounds of the impact of their access roads upon the character and appearance of Whyteleafe Road, albeit one of the reasons for refusal related to the levels of traffic generated and its access through Annes Walk resulting in significant harm to the amenities of residents of Annes Walk and to the character of the area. Nevertheless, it is considered that there is potential for alternative access arrangements which means that this site could be developed in such a manner as to avoid the harm identified by the Planning Inspector.
6.43 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 to Inspector’s Issues / Question

6.43.1 No. The site is located in the built-up area of Caterham, a Tier 1 settlement, and is available now. The site was submitted to the HELAA (reference CAT 007) and was assessed as being deliverable in SAD6.

6.43.2 The site is split between two developer interests and a number of planning applications have been submitted on this site in recent years. The most recent applications for 39 dwellings (2018/2445), for which an appeal has already been lodged, and 38 dwellings (2019/38) were refused in July this year.

6.43.3 It is noted that an application for 59 dwellings (2015/1649) was dismissed on appeal in April 2017. The reason for the dismissal was due to the harmful impact of the proposed access on the character and appearance of Whyteleafe Road. This was largely as a result of multiple access points being created along the road and particularly in light of an additional access already permitted to the south in relation to 10 dwellings (application reference 2015/2263) in June 2016. However, this is not the only viable option for accessing the site, and alternative access arrangements have been sought as part of the two most recent applications. The response to Q 6.42 explores this further.

6.43.4 Whilst there have been challenges surrounding the ability to secure planning permission on this site, it is considered that there is a realistic prospect that housing will be delivered on the site within five years and that development of the site is viable and developers continue to pursue delivery.
6.44 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 to Inspector’s Issues / Question

6.44.1 Yes. The Council considers the infrastructure requirements as set out in the policy to be reasonable and related in scale and kind to the site, based on geographical proximity and the known infrastructure provision in the immediate vicinity of the site.
6.45  Are the proposed Modifications necessary for soundness?

Response to Inspector’s Issues / Question

6.45.1 Some are. These are those proposed modifications initially set out in the submission Examination Library Document MD16 - 2019 and then reproduced in Part 1 Schedule of Proposed Main Modifications (Submitted January 2019) of Examination Document TED01 (prepared as part of the Council’s response to the Inspector’s initial questions (ID 2 and 3).

6.45.2 The Council’s view is that the remaining proposed modifications to HSG06 do not go to the soundness of the Plan (these are proposed other or minor modifications identified through tracked changes in Examination Library Document MD1 - the Publication ‘Our Local Plan:2033’). The modifications are only suggested for the benefit of clarity / consistency with the wider plan and to assist in the interpretation of the policy. The intent and use of the policy is not altered by these modifications.

Evidence

MD1 – Our Local Plan 2033 Submission 2019
MD16 – Schedule of Proposed Main Modifications 2019
SAD6 – Housing and Economic Land Availability Assessment 2017-2018 Appendix 3 Deliverable and Developable Sites
TED01 - Schedule of Proposed Main Modifications (May 2019)

Supporting Papers

None

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HSG09: Land at Fern Towers, Harestone Hill

6.46 Would the loss of the garages and the redevelopment of the site give rise to unacceptable parking stress in the surrounding area?

Response to Inspector’s Issues / Question

6.46.1 The site was originally designated as garaging in association with the 62 flats at Fern Towers (application reference CAT/6723) in 1965. However, only 55 of the garages were designated on this part of the site. It is also noted that on street parking is already utilised within the existing cul-de-sac, and that in general the garages themselves are often not utilised for everyday parking.

6.46.2 The development of the site for 6 units would be likely to generate a requirement for an additional 6 to 9 spaces in accordance with the Tandridge District Parking Standards SPD (adopted September 2012). However, the specific requirements will need to be considered as part of the development management decision making process, which would factor in the location of the site within walking distance to the Town Centre and Caterham Train Station. Therefore, whilst the design and layout of the site, including the number of parking spaces provided, will need to be carefully considered, the redevelopment of the site may provide more usable parking spaces than is currently provided by the existing garages. As such, the Council does not consider that the redevelopment of the site would necessarily result in unacceptable parking stress in the surrounding area.
6.47 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 to Inspector’s Issues / Question

6.47.1 No. The site is located within the built-up area of Caterham, a Tier 1 settlement, and as such is in a suitable location for housing development. The site is owned by the Council and was assessed as being deliverable in SAD6 (reference CAT 044). The Council is not aware of any reason for the site not to be considered achievable and viable, with a realistic prospect that housing will be delivered on the site within five years.
6.48 Are the proposed Modifications necessary for soundness?

Response to Inspector’s Issues / Question

6.48.1 Some are. These are those proposed modifications initially set out in the submission Examination Library Document MD16 - 2019 and then reproduced in Part 1 Schedule of Proposed Main Modifications (Submitted January 2019) of Examination Document TED01 (prepared as part of the Council’s response to the Inspector’s initial questions (ID 2 and 3).

6.48.2 The Council’s view is that the remaining proposed modifications to HSG09 do not go to the soundness of the Plan (these are proposed other or minor modifications identified through tracked changes in Examination Library Document MD1 - the Publication ‘Our Local Plan:2033’). The modifications are only suggested for the benefit of clarity / consistency with the wider plan and to assist in the interpretation of the policy. The intent and use of the policy is not altered by these modifications.

Evidence

MD1 – Our Local Plan 2033 Submission 2019
MD16 – Schedule of Proposed Main Modifications 2019
SAD6 – Housing and Economic Land Availability Assessment 2017-2018 Appendix 3 Deliverable and Developable Sites
TED01 - Schedule of Proposed Main Modifications (May 2019)
Tandridge District Parking Standards SPD

Supporting Papers

None
HSG10: William Way Builders Merchant, 38-42 High Street, Godstone

6.49 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 to Inspector’s Issues / Question

6.49.1 No. Planning permission for 18 dwellings has been granted under application 2017/2545 on 22 May 2018, and development has commenced on site and is expected to be completed in late 2019. The site is therefore deliverable.

Document Reference TED10:
Tandridge District Council Hearing Statement Matter 6
6.50 Are the proposed Modifications necessary for soundness?

Response to Inspector’s Issues / Question

6.50.1 No. The Council’s view is that the proposed modifications to HSG10 do not go to the soundness of the Plan (these are proposed other or minor modifications identified through tracked changes in Examination Library Document MD1 - the Publication ‘Our Local Plan:2033’). The modifications are only suggested for the benefit of clarity / consistency with the wider plan and to assist in the interpretation of the policy. The intent and use of the policy is not altered by these modifications.

Evidence

MD1 – Our Local Plan 2033 Submission 2019

Supporting Papers

None
HSG11: Land to the West of Godstone

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

Response to Inspector’s Issues / Question

6.51.1 The Council considers that there are exceptional circumstances that warrant release of this site from the Green Belt (GB1 and GB2).

6.51.2 The following table summarises the Council’s conclusions in relation to this site’s performance in relation to 4 of the Green Belt purposes.

| Purpose   | Description                                                                 | Weight
|-----------|-----------------------------------------------------------------------------|--------
| Purpose 1 | To check unrestricted sprawl of large built-up areas                        | Relatively Strong |
| Purpose 2 | To prevent neighbouring towns merging into one another                       | Relatively Weak   |
| Purpose 3 | To assist in safeguarding the countryside from encroachment                 | Relatively Strong |
| Purpose 4 | To preserve the setting and special character of historic towns              | Relatively Weak   |

6.51.3 This site is considered to meet only two of the Green Belt purposes.

6.51.4 This site has been identified as being able to contribute towards benefits above and beyond any needed to off-set impacts associated with its development, contributing to wider community benefits such as securing public open space provision.

6.51.5 Together these factors are considered to represent the exceptional circumstances needed to justify the release of this site from the Green Belt.

Document Reference TED10:
Tandridge District Council Hearing Statement Matter 6

66
6.52 Is the proposed Green Belt boundary justified and consistent with national policy as set out in paragraph 85 of the Framework?

Response to Inspector's Issues / Question

6.52.1 Yes. The Council considers that the site boundary is justified. The north of the site contains part of a temporary quarry access road, bunding and vegetation, which then extends to the west. It is considered that these features are readily recognisable and relatively permanent, but the Council recognises that these will need to be reinforced through appropriate design and layout of the site to further ensure the Green Belt boundaries comply with Para.85. An appropriately worded condition has been included to secure this.
6.53 Is the Policies Map in respect of the boundary of the Surrey Hills Area of Outstanding Natural Beauty (AONB) correct?

Response to Inspector’s Issues / Question

6.53.1 Yes. The Council has checked the AONB boundary against the original AONB Designation Order 1956 Map, having been provided with an extract from one of original maps by the Surrey Hill’s AONB Unit. The Council is therefore satisfied that boundary of the Surrey Hills AONB is correct.
6.54 Does the allocation constitute major development within the AONB?

Response to Inspector's Issues / Question

6.54.1 No. The majority of the site is not within the AONB, but the Council accepts that a small area to the north of the site falls within the designated landscape. In arriving at the allocation, the Council worked closely with the Surrey Hills AONB unit and took advice on proposed allocations.

6.54.2 Paragraph 116 of the NPPF (2012) states that “Planning permission should be refused for major developments in these designated areas except in exceptional circumstances and where it can be demonstrated that they are in the public interest.” However, it does not define ‘major development’.

6.54.3 The associated Planning Practice Guidance stated as follows:

“Whether a proposed development in those designated areas should be treated as major development, to which the policy in paragraph 116 of the Framework applies, will be a matter for the relevant decision taker, taking into account the proposal in question and the local context.” (PPG Reference ID: 8-005=-20140306).

6.54.4 The Council is fully cognisant of the fact that limited areas to the north of this site are located within the Surrey Hills Area of Outstanding Natural Beauty; noting as such in the site description for Policy HSG11. The Council’s Landscape Capacity and Sensitivity Study (2016) (LAN15) also took this into account, noting that potential for mitigation includes maintaining the northern portion of the site for open space and planting.

6.54.5 The Council is satisfied that, given the location, extent and configuration of the sections of this site within the AONB and the potential for mitigation as set out in the landscape evidence, development proposals could be designed such that they do not constitute major development within the AONB. To guide the development management, process the Council has included clause III. of policy HSG11. The assessment of any application will also be supported by TLP33 and other relevant policies.
6.55 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 to Inspector’s Issues / Question

6.55.1 Yes, the Council considers the infrastructure requirements as set out in the policy to be reasonable and related in scale and kind to the site, based on geographical proximity and the known infrastructure provision in the immediate vicinity of the site.
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 to Inspector’s Issues / Question

6.56.1 No. The site is located adjacent to the settlement boundary of Godstone, a Tier 2 settlement, and as such is in a suitable location for housing development. The site was submitted to the HELAA (reference GOD 010) and was assessed as being developable in SAD6. The Council is not aware of any matters which would mean the site could not viably be developed at the point envisaged.
6.57 Are the proposed Modifications necessary for soundness?

Response to Inspector’s Issues / Question

6.57.1 No. The Council’s view is that the proposed modifications to HSG11 do not go to the soundness of the Plan (these are proposed other or minor modifications identified through tracked changes in Examination Library Document MD1 - the Publication ‘Our Local Plan:2033’). The modifications are only suggested for the benefit of clarity / consistency with the wider plan and to assist in the interpretation of the policy. The intent and use of the policy is not altered by these modifications.

Evidence

GB1 – Green Belt Assessment (Part 3) Exceptional Circumstances and Insetting 2018
GB2 – Green Belt Assessment (Part 3) Appendix 1 2018
LAN15 – Tandridge Landscape Capacity and Sensitivity Study Godstone 2016
MD1 – Our Local Plan 2033 Submission 2019
SAD6 – Housing and Economic Land Availability Assessment 2017-2018 Appendix 3 Deliverable and Developable Sites

Supporting Papers

None
HSG12: Land at the Old Cottage, Station Road, Lingfield

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

Response to Inspector’s Issues / Question

6.58.1 Yes. The Council considers that there are exceptional circumstances that warrant release of this site from the Green Belt (GB1 and GB2).

6.58.2 The following table summarises the Council’s conclusions in relation to this site’s performance in relation to the four key Green Belt purposes.

<table>
<thead>
<tr>
<th>Purpose 1</th>
<th>To check unrestricted sprawl of large built-up areas</th>
<th>Relatively Weak</th>
</tr>
</thead>
<tbody>
<tr>
<td>Purpose 2</td>
<td>To prevent neighbouring towns merging into one another</td>
<td>Relatively Weak</td>
</tr>
<tr>
<td>Purpose 3</td>
<td>To assist in safeguarding the countryside from encroachment</td>
<td>Moderate</td>
</tr>
<tr>
<td>Purpose 4</td>
<td>To preserve the setting and special character of historic towns</td>
<td>Strong</td>
</tr>
</tbody>
</table>

6.58.3 This site is considered to meet only two of the Green Belt purposes.

6.58.4 This site has been identified as being able to contribute towards benefits above and beyond any needed to off-set impacts associated with its development, including wider community benefits such as the opportunity to contribute to the funding of a DDA compliant footbridge at Lingfield Station, Lingfield Surgery improvements, highway improvements and by providing communal parking and public open space.

6.58.5 Together these factors are considered to represent the exceptional circumstances needed to justify the release of this site from the Green Belt.
6.59 Is the proposed Green Belt boundary justified and consistent with national policy as set out in paragraph 85 of the Framework?

Response to Inspector’s Issues / Question

6.59.1 Yes. The Council considers that the site boundary is justified. The Green Belt boundaries comprise Town Hill to the south, which also benefits from a high tree line, and Station Road along part of the eastern boundary. It is recognised that the remaining eastern boundary either comprises residential curtilages or is not well defined. It is considered that some elements are readily recognisable and reasonably permanent, but the Council recognises that other elements will need to be reinforced and the use of appropriate design and layout of the site will ensure the Green Belt boundaries comply with Para.85. An appropriately worded condition has been included to secure this.
6.60 What is the evidence that the potential effect on the significance of the heritage assets or their settings which may result from the proposed development has been assessed?

Response to Inspector’s Issues / Question

6.60.1 The Local Plan has considered the various heritage assets and their setting throughout the process and the evidence for this can be found in different parts of the evidence-base. This includes the Council’s initial assessment as to the site’s suitability, availability and achievability through its Housing and Employment Land Availability Assessment (SAD1, SAD3 – SAD11) and the Tandridge Landscape Capacity and Sensitivity Study – Addendum (April 2017; Rev B) (LAN3). In addition, the Sustainability Appraisal requires assessment against SA objective 3 (To conserve and enhance archaeological, historic and cultural assets) and as such this site has been assessed iteratively in terms of the heritage assets, the potential impact upon them and potential mitigation measures as part of the SA process (SSHA3).

6.60.2 The Council considers that, throughout the process, regard has been had to the potential effect on heritage assets or their setting and will need to be an ongoing consideration of any application.

Document Reference TED10: Tandridge District Council Hearing Statement Matter 6
6.61 Would criterion IV. Landscape be effective in safeguarding the character and appearance of Lingfield?

Response to Inspector’s Issues / Question

6.61.1 The rationale behind criterion IV is to safeguard the character and appearance of Lingfield. It is recognised by the Council that the hedgerows and trees form part of the setting of this part of Lingfield. Criterion IV is intended to minimise and soften the impact of built form in this location, whilst enabling development to occur, it is envisioned that the site can be developed in a sensitive way to incorporate the elements that make the Lingfield Conservation Area and its surrounding context special.

6.61.2 It is the Council’s contention that incorporating the existing landscape features and enhancing these through additional planting and landscaping as part of the development would minimise negative impacts and contribute positively to the Conservation Area and its setting. As such the Council considers that landscaping in combination with Criterion I and criterion III would achieve this balance.
6.62 In terms of flood risk, is the proposed allocation of the site justified in respect of the Sequential Test? Would the allocation be effective in ensuring that inappropriate development in areas at risk of flooding are avoided?

Response to Inspector’s Issues / Question

6.62.1 Yes. The Council considers the allocation of the site justified in respect of the Sequential Test. The Council commissioned a Strategic Flood Risk Assessment (Levels 1 and 2) (WTR 3 – WTR 13), which was used to apply the Sequential Test and Exceptions Test, as detailed in the Flood Risk and The Development Allocations – Site Selection Process (WTR1).

6.62.2 The Council considers that the site-specific information contained within the SFRA (Level 2) provides sufficient information to demonstrate that a housing development at this site could be designed to ensure inappropriate development in areas at risk of flooding are avoided.

6.62.3 Applications for the development of this site will have to be accompanied by a site-specific Flood Risk Assessment and will need to respond to all sources of flooding as required by policy HSG12 clause V. Moreover, any application will be considered against policy TLP47, which requires that development reduces flood risk and minimises the impact of flooding by:

IV. Applying the sequential approach to site layout by locating the most vulnerable uses in parts of the site at the lowest risk of flooding.

In addition, it states that:

‘In areas at risk of flooding development should be safe for the lifetime of the development and should flood resilience and resistant measures into the design, layout and form of buildings to reduce the level of flood risk both on site and elsewhere.’

6.62.4 As such the Council is satisfied that this allocation would be effective in ensuring that inappropriate development at risk of flooding are avoided.

Document Reference TED10:
Tandridge District Council Hearing Statement Matter 6
6.63 What account has been taken of the emerging Lingfield Neighbourhood Plan in framing the proposed allocation?

Response to Inspector’s Issues / Question

6.63.1 Lingfield Parish was designated as a Neighbourhood Area in 2014. The Neighbourhood Plan has not been substantively progressed since this date. The Council has been advised that the earliest the draft Neighbourhood Plan is likely to go through its Regulation 14 consultation is towards the end of this year (2019). Accordingly, the Council has had regard to whatever information has been available to it, at the relevant stages when framing the proposed allocation.
6.64 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 to Inspector’s Issues / Question

6.64.1 Yes, the Council considers the infrastructure requirements as set out in the policy to be reasonable and related in scale and kind to the site, based on geographical proximity and the known infrastructure provision in the immediate vicinity of the site.
6.65 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 to Inspector’s Issues / Question

6.65.1 No. The site is located adjacent to the settlement boundary of Lingfield, a Tier 2 settlement, and as such is in a suitable location for housing development. The site was submitted to the HELAA (reference LIN 030) and was assessed as being developable in SAD6.

6.65.2 SAD6 acknowledged that the site is within a Conservation Area and a Grade II* listed building sits to the east. However, whilst the fact the over half the site is within the Conservation will need to be considered through the development management process, no constraints that could render the site financially unviable were identified, and the estimated site yield reflected this constraint.

6.65.3 The Council is not aware of any matters which would mean the site could not viably be developed at the point envisaged.
6.66 Are the proposed Modifications necessary for soundness?

Response to Inspector’s Issues / Question

6.66.1 No. The Council’s view is that the proposed modifications to HSG12 do not go to the soundness of the Plan (these are proposed other or minor modifications identified through tracked changes in Examination Library Document MD1 - the Publication ‘Our Local Plan:2033’). The modifications are only suggested for the benefit of clarity / consistency with the wider plan and to assist in the interpretation of the policy. The intent and use of the policy is not altered by these modifications.

Evidence

GB1 – Green Belt Assessment (Part 3) Exceptional Circumstances and Insetting 2018
GB2 – Green Belt Assessment (Part 3) Appendix 1 2018
LAN3 – Tandridge Landscape Capacity and Sensitivity Study Addendum 2017
MD1 – Our Local Plan 2033 Submission 2019
SAD1 – Housing and Economic Land Availability Assessment Interim Report 2019
SAD3 – Housing and Economic Land Availability Assessment 2017-2018
SAD4 – Housing and Economic Land Availability Assessment 2017-2018 Appendix 1 Acronyms Used
SAD5 – Housing and Economic Land Availability Assessment 2017-2018 Appendix 2 Viability Report
SAD6 – Housing and Economic Land Availability Assessment 2017-2018 Appendix 3 Deliverable and Developable Sites
SAD7 – Housing and Economic Land Availability Assessment 2017-2018 Appendix 4 Unsuitable and Unavailable Sites
SAD8 – Housing and Economic Land Availability Assessment 2017-2018 Appendix 5 Tandridge Landowner Survey 2016

Document Reference TED10:
Tandridge District Council Hearing Statement Matter 6
SAD9 – Housing and Economic Land Availability Assessment 2017-2018 Appendix 6 Employment Sites

SAD10 – Housing and Economic Land Availability Assessment 2017-2018 Appendix 7 Traveller Sites

SAD11 – Housing and Economic Land Availability Assessment 2017-2018 Appendix 8 Additional Sites for consideration

SSHA3 – Tandridge Local Plan Sustainability Appraisal Regulation 19 Stage Volume 2 Options Assessment 2018

WTR1 – Flood Risk Sequential and Exception Test 2019

WTR3 – Tandridge District Level 2 Strategic Flood Risk Assessment 2018

WTR4 – Tandridge District Level 2 Strategic Flood Risk Assessment Detailed Site Summary Tables Appendix A 2018

WTR5 – Tandridge District Level 2 Strategic Flood Risk Assessment Catchment Summary Tables Appendix B 2018

WTR6 – Tandridge District Level 2 Strategic Flood Risk Assessment Garden Community Summary Tables Appendix C

WTR7 – Tandridge District Level 2 Strategic Flood Risk Assessment Detailed Site Summary Table Appendix D CAT 007 Map 2018

WTR8 – Tandridge District Level 2 Strategic Flood Risk Assessment Detailed Site Summary Table Appendix E Caterham and Whyteleafe Map 2018

WTR9 – Tandridge District Level 2 Strategic Flood Risk Assessment Detailed Site Summary Table Appendix E Caterham on the Hill Map 2018

WTR10 - Tandridge District Level 2 Strategic Flood Risk Assessment Detailed Site Summary Table Appendix E Smallfield Map 2018

WTR11 - Tandridge District Level 2 Strategic Flood Risk Assessment Detailed Site Summary Table Appendix F Blindley Heath Map 2018

WTR12 - Tandridge District Level 2 Strategic Flood Risk Assessment Detailed Site Summary Table Appendix F Redhill Aerodrome Map 2018

Document Reference TED10:
Tandridge District Council Hearing Statement Matter 6
Supporting Papers
None
6.67 What are the exceptional circumstances for the release of the site from the Green Belt?

Response to Inspector’s Issues / Question

6.67.1 The Council considers that there are exceptional circumstances that warrant release of this site from the Green Belt (GB1 and GB2).

6.67.2 The following table summarises the Council’s conclusions in relation to this site’s performance in relation to the four key Green Belt purposes.

<table>
<thead>
<tr>
<th>Purpose</th>
<th>Description</th>
<th>Rating</th>
</tr>
</thead>
<tbody>
<tr>
<td>Purpose 1</td>
<td>To check unrestricted sprawl of large built-up areas</td>
<td>Moderate</td>
</tr>
<tr>
<td>Purpose 2</td>
<td>To prevent neighbouring towns merging into one another</td>
<td>Relatively Weak</td>
</tr>
<tr>
<td>Purpose 3</td>
<td>To assist in safeguarding the countryside from encroachment</td>
<td>Relatively Strong</td>
</tr>
<tr>
<td>Purpose 4</td>
<td>To preserve the setting and special character of historic towns</td>
<td>Weak</td>
</tr>
</tbody>
</table>

6.67.3 This site is considered to meet only two of the Green Belt purposes and is considered to perform relatively weakly overall against all four purposes in combination.

6.67.4 This site has been identified as being able to contribute towards benefits above and beyond any needed to off-set impacts associated with its development, including wider community benefits such as its potential to enhance the local school provision in conjunction with Holland Junior School and Hurst Green Infants School, which could help support additional infant places should St Peters in Tandridge become a through school. The school position is currently uncertain, but the proposal for development of this site opens up options for the future.
6.67.5 Together these factors are considered to represent the exceptional circumstances needed to justify the release of this site from the Green Belt.
6.68 Is the proposed Green Belt boundary justified and consistent with national policy as set out in paragraph 85 of the Framework?

Response to Inspector’s Issues / Question

6.68.1 Yes. The Council considers that the site boundary is justified. The Green Belt boundaries are defined by a mature tree belt to the east, beyond which is Red Lane, whilst to the south it is defined by deciduous woodland and a public footpath. It is considered that the Green Belt boundaries are readily recognisable and reasonably permanent, but the Council recognises that they will need to be reinforced and the use of appropriate design and layout of the site will further ensure the Green Belt boundaries comply with paragraph 85. An appropriately worded condition has been included to secure this.
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 to Inspector's Issues / Question

6.69.1 Yes. The Council considers the infrastructure requirements as set out in the policy to be reasonable and related in scale and kind to the site, based on geographical proximity and the known infrastructure provision in the immediate vicinity of the site.
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 to Inspector’s Issues / Question

6.70.1 Yes. It is the Council's contention that the policy is justified, effective and necessary. There exists a current demand for school places in the Oxted / Limpsfield / Hurst Green area. As a result, there is a need to provide some additional infant school places in the locality.

6.70.2 The policy as currently worded, allows for potential school provision of Hurst Green Infants and Holland Juniors to be combined onto a single site in the Hurst Green area over the medium to long term, should the opportunity arise. The policy is designed to allow for a sustainable and pragmatic safeguarding of land for school provision. For a decision maker, this means that provision of a school on the site should be material, if the Local Education Authority supports such a provision at the time a planning application is made. Where the Local Education Authority are unable to support school provision on the site, any application for housing provision should be supported.
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 to Inspector’s Issues / Question

6.71.1 No. The site is located adjacent to the settlement boundary of Hurst Green, a Tier 1 settlement, and as such is in a suitable location for housing development. The site is an amalgamation of three sites submitted to the HELAA (OXT 021, 048 and 063) and was assessed as being developable in SAD6 under reference OXT 021. The Council is not aware of any matters which would mean the site could not viably be developed at the point envisaged.
6.72  Are the proposed Modifications necessary for soundness?

Response to Inspector's Issues / Question

6.72.1 Some are. These are those proposed modifications initially set out in the submission Examination Library Document MD16 - 2019 and then reproduced in Part 1 Schedule of Proposed Main Modifications (Submitted January 2019) of Examination Document TED01 (prepared as part of the Council's response to the Inspector's initial questions (ID 2 and 3).

6.72.2 The Council's view is that the remaining proposed modifications to HSG13 do not go to the soundness of the Plan (these are proposed other or minor modifications identified through tracked changes in Examination Library Document MD1 - the Publication ‘Our Local Plan:2033’). The modifications are only suggested for the benefit of clarity / consistency with the wider plan and to assist in the interpretation of the policy. The intent and use of the policy is not altered by these modifications.

Evidence

GB1 – Green Belt Assessment (Part 3) Exceptional Circumstances and Insetting 2018

GB2 – Green Belt Assessment (Part 3) Appendix 1 2018

MD1 – Our Local Plan 2033 Submission 2019

MD16 – Schedule of Proposed Main Modifications 2019

SAD6 – Housing and Economic Land Availability Assessment 2017-2018 Appendix 3 Deliverable and Developable Sites

TED01 - Schedule of Proposed Main Modifications (May 2019)

Supporting Papers

None
HSG14: Warren Lane Depot, Hurst Green

6.73 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 to Inspector’s Issues / Question

6.73.1 Yes, the Council considers the infrastructure requirements as set out in the policy to be reasonable and related in scale and kind to the site, based on geographical proximity and the known infrastructure provision in the immediate vicinity of the site.
6.74 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 to Inspector’s Issues / Question

6.74.1 No. The site is located largely within the built-up area of Hurst Green, a Tier 1 settlement, and as such is in a suitable location for housing development. The site is owned by the Council and was assessed as being deliverable in SAD6 (reference OXT 067). SAD6 points out that ‘owing to its current use there may be land contamination issues, but it is not thought that such issues are incapable of being overcome.’

6.74.2 The Council is not aware of any reason for the site not to be considered achievable and viable, with a realistic prospect that housing will be delivered on the site within five years.
6.75 Are the proposed Modifications necessary for soundness?

Response to Inspector's Issues / Question

6.75.1 Some are. These are those proposed modifications initially set out in the submission Examination Library Document MD16 - 2019 and then reproduced in Part 1 Schedule of Proposed Main Modifications (Submitted January 2019) of Examination Document TED01 (prepared as part of the Council's response to the Inspector's initial questions (ID 2 and 3).

6.75.2 The Council's view is that the remaining proposed modifications to HSG14 do not go to the soundness of the Plan (these are proposed other or minor modifications identified through tracked changes in Examination Library Document MD1 - the Publication ‘Our Local Plan:2033’). The modifications are only suggested for the benefit of clarity / consistency with the wider plan and to assist in the interpretation of the policy. The intent and use of the policy is not altered by these modifications.

Evidence

MD1 – Our Local Plan 2033 Submission 2019
MD16 – Schedule of Proposed Main Modifications 2019
SAD6 – Housing and Economic Land Availability Assessment 2017-2018 Appendix 3 Deliverable and Developable Sites
TED01 - Schedule of Proposed Main Modifications (May 2019)

Supporting Papers

None

Document Reference TED10:
Tandridge District Council Hearing Statement Matter 6
6.76 What are the exceptional circumstances for the release of the site from the Green Belt?

Response to Inspector’s Issues / Question

6.76.1 The Council considers that there are exceptional circumstances that warrant release of this site from the Green Belt (GB1 and GB2).

6.76.2 The following table summarises the Council’s conclusions in relation to this site’s performance in relation to the four key Green Belt purposes.

| Purpose 1 | To check unrestricted sprawl of large built-up areas | Moderate |
| Purpose 2 | To prevent neighbouring towns merging into one another | Moderate |
| Purpose 3 | To assist in safeguarding the countryside from encroachment | Moderate |
| Purpose 4 | To preserve the setting and special character of historic towns | Weak |

6.76.3 This site is considered to meet three of the Green Belt purposes but is considered to perform relatively weakly overall against all four purposes in combination.

6.76.4 This site has been identified as being able to contribute towards benefits above and beyond any needed to off-set impacts associated with its development, including wider community benefits such as the opportunity for expansion and re-location of local education provision and improved sports provision.

6.76.5 Together these factors are considered to represent the exceptional circumstances needed to justify the release of this site from the Green Belt.

Document Reference TED10: Tandridge District Council Hearing Statement Matter 6
6.77  Is the proposed Green Belt boundary justified and consistent with national policy as set out in paragraph 85 of the Framework?

Response to Inspector’s Issues / Question

6.77.1 Yes. The Council considers that the site boundary is justified. The Green Belt boundaries to the west include sections of bunding, and a tree belt, and in part abut a public footpath. It is considered that the Green Belt boundaries are readily recognisable and reasonably permanent, but the Council recognises that they will need to be reinforced and the use of appropriate design and layout of the site will further ensure the Green Belt boundaries comply with paragraph 85. An appropriately worded condition has been included to secure this.
6.78 Is the proposed allocation consistent with paragraph 74 of the Framework in respect of the loss of recreation space? Would it be effective in bringing forward replacement playing pitch provision?

Response to Inspector’s Issues / Question

6.78.1 In accordance with NPPF Para.74, the Council is aware of the need to offset / replace the loss of three recreation sites that are to be allocated for housing. These are:

• Greenacres Leisure Centre (Policy HSG 15)
• John Fisher Sports Club (Policy HSG 15)
• Shelton Sports and Social Club (Policy HSG18)

6.78.2 Also in accordance with NPPF paragraph 74, Policies HSG15 and HSG18 both stipulate that replacement provision will need to be provided to an equal or better standard. Sport England will oppose the granting of planning permission for any development which would lead to the loss of playing field land unless it is suitably replaced.

6.78.3 However, the Council recognises that opportunities to fully comply with this provision may be limited within Warlingham itself due to constraints on land availability. Therefore, in order to ensure this that replacement provision of a suitable standard (in terms of quality and quantity) is achievable in practice, Policies HSG15 and HSG18 allow some degree of flexibility as to how this may be achieved, locally or as part of the South Godstone Garden Community development.

6.78.4 The Council and its consultants worked with Sport England and the National Governing Bodies (Football Association, England Hockey, England Cricket and England Rugby) in the production of the Playing Pitch Strategy (PPS) and Action Plan (INF13 and 14). The principle of replacing the Warlingham provision with 3g artificial pitches within the Garden Community was supported by Sport England and the NGBs. Policy TLP39 of the Local Plan supports the delivery of three new 3g pitches District wide, including one that is World Rugby compliant, and states that the Council will work actively with Sport England and relevant partners to facilitate the delivery. In this light, the Council
continues to work with both Sport England and the Football Association (FA) on this matter, particularly in relation to the emerging Local Football Facilities Plan.

6.78.5 It should also be noted that Section 1.2 of the PPS Strategy and Action Plan concludes that ‘The existing position for all sports is either that demand is broadly being met or that there is a shortfall, whereas the future position shows the creation of some additional shortfalls and the exacerbation of some existing shortfalls. There are current and future shortfalls of sand-based AGPs for hockey, 3G pitches and rugby union pitches and future shortfalls of football pitches and cricket squares.’

6.78.6 There is clearly no justification for loss of pitches without replacement by equivalent or better provision in terms of quantity and quality in a suitable location. However, it is also important to note that this need no necessarily be the equivalent square metre land take, since 3g can accommodate significantly higher levels of play than grass.

6.78.7 The Playing Pitch Strategy stipulated that sites HSG15 and HSG18 should be replaced by 3x3g pitches, including one that is World Rugby Compliant, at South Godstone. However, Policy HSG15 has introduced more flexibility to also allow more local mitigation which will potentially allow the site to come forward sooner. Furthermore, the subsequent proposed Main Modification to Policy SGGC01 (TED01) stipulates that 2x3g pitches are appropriate at South Godstone, a view supported by Sport England as representing a quantum that is proportionate to the size of the settlement.
6.79 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 to Inspector’s Issues / Question

6.79.1 Yes, the Council considers the infrastructure requirements as set out in the policy to be reasonable and related in scale and kind to the site, based on geographical proximity and the known infrastructure provision in the immediate vicinity of the site.
6.80 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 to Inspector’s Issues / Question

6.80.1 No. The site is located adjacent to the settlement boundary of Warlingham, a Tier 1 settlement, and as such is in a suitable location for housing development. The site is split between two developers and comprises of two HELAA sites (WAR 005 and WAR 036). Each site was assessed as being developable in SAD6, and the Council is not aware of any matters which would mean the site could not viably be developed at the point envisaged.
6.81 Are the proposed Modifications necessary for soundness?

Response to Inspector’s Issues / Question

6.81.1 Some are. These are those proposed modifications initially set out in the submission Examination Library Document MD16 - 2019 and then reproduced in Part 1 Schedule of Proposed Main Modifications (Submitted January 2019) of Examination Document TED01 (prepared as part of the Council’s response to the Inspector’s initial questions (ID 2 and 3).

6.81.2 The Council’s view is that the remaining proposed modifications to HSG15 do not go to the soundness of the Plan (these are proposed other or minor modifications identified through tracked changes in Examination Library Document MD1 - the Publication ‘Our Local Plan:2033’). The modifications are only suggested for the benefit of clarity / consistency with the wider plan and to assist in the interpretation of the policy. The intent and use of the policy is not altered by these modifications.

Evidence

GB1 – Green Belt Assessment (Part 3) Exceptional Circumstances and Insetting 2018
GB2 – Green Belt Assessment (Part 3) Appendix 1 2018
INF13 – Tandridge District Playing Pitch Strategy and Action Plan 2018
INF14 – Tandridge District Playing Pitch Strategy Assessment Report 2018
MD1 – Our Local Plan 2033 Submission 2019
MD16 – Schedule of Proposed Main Modifications 2019
OTL6 – Assessing Needs and Opportunities for Indoor Sports and Facilities in Tandridge 2017
SAD6 – Housing and Economic Land Availability Assessment 2017-2018 Appendix 3 Deliverable and Developable Sites
TED01 - Schedule of Proposed Main Modifications (May 2019)
Supporting Papers

None
HSG16: Land at Green Hill and Alexandra Avenue, Warlingham

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

Response to Inspector’s Issues / Question

6.82.1 The Council considers that there are exceptional circumstances that warrant release of this site from the Green Belt (GB1 and GB2).

6.82.2 The following table summarises the Council’s conclusions in relation to this site’s performance in relation to the four key Green Belt purposes.

<table>
<thead>
<tr>
<th>Purpose 1</th>
<th>To check unrestricted sprawl of large built-up areas</th>
<th>Moderate</th>
</tr>
</thead>
<tbody>
<tr>
<td>Purpose 2</td>
<td>To prevent neighbouring towns merging into one another</td>
<td>Relatively Strong</td>
</tr>
<tr>
<td>Purpose 3</td>
<td>To assist in safeguarding the countryside from encroachment</td>
<td>Moderate</td>
</tr>
<tr>
<td>Purpose 4</td>
<td>To preserve the setting and special character of historic towns</td>
<td>Weak</td>
</tr>
</tbody>
</table>

6.82.3 This site is considered to meet three of the Green Belt purposes, but is considered to perform relatively weakly overall against all four purposes in combination.

6.82.4 This site has been identified as being able to contribute towards benefits above and beyond any needed to off-set impacts associated with its development, including wider community benefits, by providing extra care provision, which would meet a need identified in this parish by Surrey County Council.

6.82.5 Together these factors are considered to represent the exceptional circumstances needed to justify the release of this site from the Green Belt.

Document Reference TED10:
Tandridge District Council Hearing Statement Matter 6
6.83 Is the proposed Green Belt boundary justified and consistent with national policy as set out in paragraph 85 of the Framework?

Response to Inspector’s Issues / Question

6.83.1 Yes. The Council considers that the site boundary is justified. The Green Belt boundaries are aligned with a public bridleway (Green Hill Lane) flanked by trees to the north, with hedging along the boundary; Chelsham Road and a high hedge mark the south-eastern boundary. It is considered that the Green Belt boundaries are readily recognisable and reasonably permanent, but the Council recognises that they will need to be reinforced and the use of appropriate design and layout of the site will further ensure the Green Belt boundaries comply with paragraph 85. An appropriately worded condition has been included to secure this.
6.84 Is the specific requirement for the provision of 25 extra care units within policy HSG16 justified? (see also TLP14)

Response to Inspector’s Issues / Question

6.84.1 Housing provision for the growing older persons population is a priority under the NPPF and the Council’s Housing Strategy. This is reflected in PolicyTLP10 Responsive Housing Strategy.
6.85 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 to Inspector’s Issues / Question

6.85.1 Yes, the Council considers the infrastructure requirements as set out in the policy to be reasonable and related in scale and kind to the site, based on geographical proximity and the known infrastructure provision in the immediate vicinity of the site.
6.86 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 to Inspector’s Issues / Question

6.86.1 No. The site is located adjacent to the settlement boundary of Warlingham, a Tier 1 settlement, and as such is in a suitable location for housing development. The site comprises of two HELAA sites which have been combined to form HSG16, and each site (WAR 011 and WAR 023) was assessed as being developable in SAD6. The Council is not aware of any matters which would mean the site could not viably be developed at the point envisaged.
6.87 Are the proposed Modifications necessary for soundness?

Response to Inspector's Issues / Question

6.87.1 Some are. These are those proposed modifications initially set out in the submission Examination Library Document MD16 - 2019 and then reproduced in Part 1 Schedule of Proposed Main Modifications (Submitted January 2019) of Examination Document TED01 (prepared as part of the Council's response to the Inspector's initial questions (ID 2 and 3).

6.87.2 The Council's view is that the remaining proposed modifications to HSG16 do not go to the soundness of the Plan (these are proposed other or minor modifications identified through tracked changes in Examination Library Document MD1 - the Publication ‘Our Local Plan:2033’). The modifications are only suggested for the benefit of clarity / consistency with the wider plan and to assist in the interpretation of the policy. The intent and use of the policy is not altered by these modifications.

Evidence

GB1 – Green Belt Assessment (Part 3) Exceptional Circumstances and Insetting 2018
GB2 – Green Belt Assessment (Part 3) Appendix 1 2018
MD1 – Our Local Plan 2033 Submission 2019
MD16 – Schedule of Proposed Main Modifications 2019
SAD6 – Housing and Economic Land Availability Assessment 2017-2018 Appendix 3 Deliverable and Developable Sites
TED01 - Schedule of Proposed Main Modifications (May 2019)

Supporting Papers

None

Document Reference TED10:
Tandridge District Council Hearing Statement Matter 6
6.88 What are the exceptional circumstances for the release of the site from the Green Belt?

Response to Inspector’s Issues / Question

6.88.1 The Council considers that there are exceptional circumstances that warrant release of this site from the Green Belt (GB1 and GB2).

6.88.2 The following table summarises the Council’s conclusions in relation to this site’s performance in relation to the four key Green Belt purposes.

| Purpose 1 | To check unrestricted sprawl of large built-up areas | Moderate |
| Purpose 2 | To prevent neighbouring towns merging into one another | Relatively Weak |
| Purpose 3 | To assist in safeguarding the countryside from encroachment | Moderate |
| Purpose 4 | To preserve the setting and special character of historic towns | Relatively Weak |

6.88.3 This site is considered to meet only two of the Green Belt purposes and is considered to perform relatively weakly overall against all four purposes in combination.

6.88.4 This site has been identified as being able to contribute towards benefits above and beyond any needed to off-set impacts associated with its development, including wider community benefits such as highway improvements.

6.88.5 Together these factors are considered to represent the exceptional circumstances needed to justify the release of this site from the Green Belt.
6.89 Is the proposed Green Belt boundary justified and consistent with national policy as set out in paragraph 85 of the Framework?

Response to Inspector’s Issues / Question

6.89.1 Yes. The Council considers that the site boundary is justified. The Green Belt boundaries are defined by a hedgerow to the north and a tree belt and a materials recycling centre to the west. It is considered that the Green Belt boundaries are readily recognisable and reasonably permanent, but the Council recognises that they will need to be reinforced and the use of appropriate design and layout of the site will further ensure the Green Belt boundaries comply with paragraph 85. An appropriately worded condition has been included to secure this.
6.90 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 to Inspector’s Issues / Question

6.90.1 Yes, the Council considers the infrastructure requirements as set out in the policy to be reasonable and related in scale and kind to the site, based on geographical proximity and the known infrastructure provision in the immediate vicinity of the site.
6.91 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 to Inspector’s Issues / Question

6.91.1 No. The site is located adjacent to the settlement boundary of Warlingham, a Tier 1 settlement, and as such is in a suitable location for housing development. The site was assessed as being developable in SAD6 under reference WAR 012. The Council is not aware of any matters which would mean the site could not viably be developed at the point envisaged.
6.92 Are the proposed Modifications necessary for soundness?

Response to Inspector's Issues / Question

6.92.1 No. The Council's view is that the proposed modifications to HSG17 do not go to the soundness of the Plan (these are proposed other or minor modifications identified through tracked changes in Examination Library Document MD1 - the Publication 'Our Local Plan:2033'). The modifications are only suggested for the benefit of clarity / consistency with the wider plan and to assist in the interpretation of the policy. The intent and use of the policy is not altered by these modifications.

Evidence

GB1 – Green Belt Assessment (Part 3) Exceptional Circumstances and Insetting 2018
GB2 – Green Belt Assessment (Part 3) Appendix 1 2018
MD1 – Our Local Plan 2033 Submission 2019
SAD6 – Housing and Economic Land Availability Assessment 2017-2018 Appendix 3 Deliverable and Developable Sites

Supporting Papers

None
HSG18: Former Shelton Sports Ground, Warlingham

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

Response to Inspector’s Issues / Question

6.93.1 The Council considers that there are exceptional circumstances that warrant release of this site from the Green Belt (GB1 and GB2).

6.93.2 The following table summarises the Council’s conclusions in relation to this site’s performance in relation to the four key Green Belt purposes.

<table>
<thead>
<tr>
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<tr>
<td>Purpose 3</td>
<td>To assist in safeguarding the countryside from encroachment</td>
<td>Moderate</td>
</tr>
<tr>
<td>Purpose 4</td>
<td>To preserve the setting and special character of historic towns</td>
<td>Weak</td>
</tr>
</tbody>
</table>

6.93.3 This site is considered to meet three of the Green Belt purposes, but is considered to perform relatively weakly overall against all four purposes in combination.

6.93.4 Together these factors are considered to represent the exceptional circumstances needed to justify the release of this site from the Green Belt.
6.94 Is the proposed Green Belt boundary justified and consistent with national policy as set out in paragraph 85 of the Framework?

Response to Inspector's Issues / Question

6.94.1 Yes. The Council considers that the site boundary is justified. The Green Belt boundaries are defined by mature trees. It is considered that the Green Belt boundaries are readily recognisable and reasonably permanent, but the Council recognises that they will need to be reinforced and the use of appropriate design and layout of the site will further ensure the Green Belt boundaries comply with paragraph 85. An appropriately worded condition has been included to secure this.
6.95 Is the proposed allocation consistent with paragraph 74 of the Framework in respect of the loss of playing fields? Would it be effective in bringing forward replacement provision?

Response to Inspector’s Issues / Question

6.95.1 The Inspector is referred to the Council’s response to question 6.78 in relation to Policy HSG15, which is also directly applicable to this question 6.95 in relation to Policy HSG18, and to Policy SGC01.

6.95.2 In addition, there is a further matter specific to HSG18 that warrants mention. The case has been made by objectors that Shelton is a 'lapsed' site and therefore the pitches do not need to be replaced.

6.95.3 However, NPPF Para.74 refers to existing sports land, including playing fields. The sites at West Warlingham’s are sports pitches for the purposes of the planning use class definition, so fulfil the first sentence criteria of Para.74.

6.95.4 The Playing Pitch Strategy (INF14) does not show the land to be surplus to requirements, but it does say that the site is disused – these are not the same thing. Therefore, the second bullet point is applicable, namely ‘the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location;’

6.95.5 Sport England considers sites in the light of the National Planning Policy Framework (particularly Para 74) and Sport England’s policy on planning applications affecting playing fields ‘A Sporting Future for the Playing Fields of England’ www.sportengland.org/playingfieldspolicy.

6.95.6 Sport England’s policy is applied to any land in use as playing field or last used as playing field, irrespective of whether that use ceased more than five years ago. Lack of use should not be seen as necessarily indicating an absence of need for playing fields in the locality. Such land can retain the potential to provide playing pitches to

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meet current or future needs. This position is supported by practice / case-law, in particular:

- Appeal Ref: APP/U4610/A/12/2176169, Land off Lythalls Lane, Coventry
- Appeal Ref: APP/F1230/A/10/2122134, Land at Richmond Road, Sherbourne, Dorset DT9 3HL

6.95.7 These cases clearly demonstrate that the lawful use of the sites remains as pitches regardless of whether it is active use. Therefore, in the Warlingham case the NPPF paragraph 74 second bullet applies and the ‘loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location’.

6.95.8 Sport England’s policy is to oppose the granting of planning permission for any development which would lead to the loss of, or prejudice the use of, all or any part of a playing field or land last used as such, unless one or more of the five exceptions stated in its policy apply. As stated above, Exception 4 is applicable in the case of the West Warlingham sites.
6.96 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 to Inspector’s Issues / Question

6.96.1 Yes, the Council considers the infrastructure requirements as set out in the policy to be reasonable and related in scale and kind to the site, based on geographical proximity and the known infrastructure provision in the immediate vicinity of the site.
6.97 Would criterion II. Ecology be effective in mitigating the effects of the proposed allocation on ecology and the nearby woodland?

Response to Inspector’s Issues / Question

6.97.1 It is recognised that the site abuts mature trees on all sides although these are not defined as Ancient Woodland, and not protected by Tree Preservation Order (TPO). There are no other environmental designations on site.

6.97.2 The site has been the subject site-specific ecological survey as part of the Council’s evidence gathering (See ECO20 - Tandridge Local Plan Site Based Ecology Assessments Volume 2 Warlingham and Whyteleafe 2016, Site WAR 019). This report notes that the site boundaries are defined by ‘Strips of semi-natural broadleaf woodland dominated by native oak along site boundary. Some native trees with bat potential. Bluebells noted occasionally and other ancient woodland indicator species. Mammal holes noted including some large ones, no conclusive sign of badger, scent of fox. Broomrape species noted’. The study does not identify any protected species records on site, but does indicate a number in the surrounding area, including dormouse and several species of bat. The report also maps the site by defining areas as ecologically suitable, unsuitable and senstive.

6.97.3 The current Policy HSG18 criterion states ‘Development would need to mitigate ecological impacts through appropriate buffer zones’. It should also be noted that provision of appropriate ecological mitigation and buffer zones is also a clear requirement of other plan relevant policies TLP30 Green and Blue Infrastructure, TLP35 Biodiversity, Ecology and Habitats and TLP37 Trees and Soft Landscaping.
6.98 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 to Inspector’s Issues / Question

6.98.1 No. The site is located adjacent to the settlement boundary of Warlingham, a Tier 1 settlement, and as such is in a suitable location for housing development. The site was assessed as being developable in SAD6 under reference WAR 019.

6.98.2 It is noted that two recent applications for housing have been submitted in relation to this site, the first under reference 2016/1895 for 146 units, including extra care accommodation, was withdrawn in August 2018. The second for 4 units on only a small area of the site (reference 2017/1599) was withdrawn in August 2017. Whilst no permission has yet been granted the applications show a willingness on the part of the developer to develop the site.

6.98.3 The Council is not aware of any matters which would mean the site could not viably be developed at the point envisaged.
6.99 Are the proposed Modifications necessary for soundness?

Response to Inspector’s Issues / Question

6.99.1 Some are. These are those proposed modifications initially set out in the submission Examination Library Document MD16 - 2019 and then reproduced in Part 1 Schedule of Proposed Main Modifications (Submitted January 2019) of Examination Document TED01 (prepared as part of the Council’s response to the Inspector’s initial questions (ID 2 and 3).

6.99.2 The Council’s view is that the remaining proposed modifications to HSG18 do not go to the soundness of the Plan (these are proposed other or minor modifications identified through tracked changes in Examination Library Document MD1 - the Publication ‘Our Local Plan:2033’). The modifications are only suggested for the benefit of clarity / consistency with the wider plan and to assist in the interpretation of the policy. The intent and use of the policy is not altered by these modifications.

Evidence

ECO20 – Tandridge Local Plan Site Based Ecology Assessments Volume 2 Warlingham and Whyteleafe 2016

GB1 – Green Belt Assessment (Part 3) Exceptional Circumstances and Insetting 2018

GB2 – Green Belt Assessment (Part 3) Appendix 1 2018

INF14 – Tandridge District Playing Pitch Strategy and Action Plan 2018

MD1 – Our Local Plan 2033 Submission 2019

MD16 – Schedule of Proposed Main Modifications 2019

SAD6 – Housing and Economic Land Availability Assessment 2017-2018 Appendix 3 Deliverable and Developable Sites

TED01 - Schedule of Proposed Main Modifications (May 2019)
Supporting Papers

None
HSG19: Edgeworth Close, Whyteleafe

6.100 What effect would the redevelopment of this site have upon car parking and bin storage for nearby residents?

Response to Inspector’s Issues / Question

6.100.1 Any redevelopment would be required to set out how waste disposal needs would be met and would not negatively impact upon the necessary provisions for existing communities. Any redevelopment of the site could present an opportunity for more modernised bin facilities.
6.101 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 to Inspector’s Issues / Question

6.101.1 No. The site is located within the built-up area of Warlingham, a Tier 1 settlement, and as such is in a suitable location for housing development. The site is owned by the Council and was assessed as being deliverable in SAD6 (reference WAR 016).
6.102 Are the proposed Modifications necessary for soundness?

Response to Inspector’s Issues / Question

6.102.1 Some are. These are those proposed modifications initially set out in the submission Examination Library Document MD16 - 2019 and then reproduced in Part 1 Schedule of Proposed Main Modifications (Submitted January 2019) of Examination Document TED01 (prepared as part of the Council’s response to the Inspector’s initial questions (ID 2 and 3).

6.102.2 The Council’s view is that the remaining proposed modifications to HSG19 do not go to the soundness of the Plan (these are proposed other or minor modifications identified through tracked changes in Examination Library Document MD1 - the Publication ‘Our Local Plan:2033’). The modifications are only suggested for the benefit of clarity / consistency with the wider plan and to assist in the interpretation of the policy. The intent and use of the policy is not altered by these modifications.

Evidence

MD1 – Our Local Plan 2033 Submission 2019

MD16 – Schedule of Proposed Main Modifications 2019

SAD6 – Housing and Economic Land Availability Assessment 2017-2018 Appendix 3 Deliverable and Developable Sites

TED01 - Schedule of Proposed Main Modifications (May 2019)

Supporting Papers

None
HSG20: North Tandridge: One Public Estate (NTOPE), Caterham

6.103 In terms of paragraph 154 of the Framework, does HSG20 in seeking to achieve the objectives of the North Tandridge: One Public Estate Programme, which is not part of the development plan, provide a clear indication of how a decision maker should react to a development proposal? Is HSG20 justified and would it be effective?

Response to Inspector’s Issues / Question

6.103.1 See response to Q 2.14.

6.102.2 On the basis of the dwelling yield from this 'project' source (82 units, albeit from a range of possible and therefore unspecified sites at this time) Policy HSG20 is a justified policy, needed to reflect the role of this source of dwellings in the overall LP overall housing land supply / provision programme. The policy would be effective because the recognition of this specific element of urban capacity in the LP ensures that the decision maker prioritises housing use of NTOPE sites, and, if appropriate, grant of a housing permission.

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6.104 Are the proposed Modifications necessary for soundness?

Response to Inspector’s Issues / Question

6.104.1 No. The Council’s view is that the proposed modifications to HSG20 do not go to the soundness of the Plan (these are proposed other or minor modifications identified through tracked changes in Examination Library Document MD1 – the Publication ‘Our Local Plan:2033’). The modifications are only suggested for the benefit of clarity / consistency with the wider plan and to assist in the interpretation of the policy. The intent and use of the policy is not altered by these modifications.

Evidence

MD1 – Our Local Plan 2033 Submission 2019

Supporting Papers

None