
LAND SOUTH OF BARROW GREEN ROAD, OXTED

**PLANNING REBUTTAL TO CLIFFORD
THURLOW'S PLANNING PROOF OF
EVIDENCE**

Prepared by:

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On behalf of:

Croudace Homes Ltd

croudacehomes

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Woolf Bond Planning
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Documents

RP1 Land Use Parameter Plan No. 3129-A-1200-PL-E

1.0 Introduction

- 1.1. This Planning Rebuttal has been prepared in response to the Planning Proof of Evidence submitted by Mr Clifford Thurlow on behalf of Tandridge District Council (“TDC”).
- 1.2. The Rebuttal addresses three points:
 1. The nature of the proposed older persons accommodation (Use Class C2).
 2. The Appeal Scheme Parameter Plan.
 3. A correction to paragraph 5.16 of my Planning Evidence
- 1.3. I address each matter in turn.

2.0 The Nature of the Proposed Older Persons Accommodation (Use Class C2)

- 2.1. Paragraph 8.16 of My Thurlow’s Planning Proof of Evidence requests clarification on the nature of the proposed older persons accommodation.
- 2.2. Clarification was included in a draft ‘Care Need’ Statement of Common Ground (“SoCG”) issued to TDC on 24 November 2025. However, Mr Thurlow replied by email on 2 December 2025 advising that TDC would not be commenting on the topic-based SoCGs until after the exchange of evidence.
- 2.3. To reiterate, the specialist C2 Use older persons provision in this case relates to an 80-bed care home and not to 80 extra care units. The differences in description of units being in accordance with the terms used in the PPG at Paragraph: 010 Reference ID: 63-010-20190626:

“Residential care homes and nursing homes: These have individual rooms within a residential building and provide a high level of care meeting all activities of daily living. They do not usually include support services for independent living. This type of housing can also include dementia care homes.”

2.4. Mr Warner expands upon this position at paragraph 2.2 of his Older Persons Housing Proof of Evidence.

3.0 The Appeal Scheme Parameters Plan

3.1. The key on Parameters Plan 3129-A-1200-PL-**D** refers to C2 and C3 uses in the north-eastern part of the Site (shaded in pink).

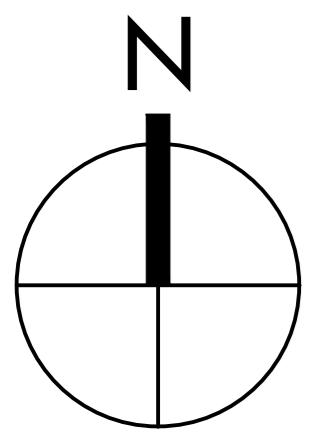
3.2. The Parameters Plan has been updated to Plan No. 3129-A-1200-PL-**E** and removes the optionality of C3 uses in this part of the Site. The key confirms that the area shaded in pink is only to accommodate the proposed C2 care use. A copy of the updated Parameters Plan is attached at **RP1**.

4.0 Correction to paragraph 5.16 of My Planning Evidence

4.1. I noticed a typographical error in paragraph 5.16 of my Planning Proof of Evidence, which I have corrected as follows:

“When carrying out my planning balance in the context of the presumption in favour of sustainable development at paragraph 11(d)(ii) of the NPPF, I conclude that the **adverse impacts would are not significantly and demonstrably, outweighed by these** benefits.”

RP1



BARROW GREEN ROAD

4.2m

Brookmead

Pond

Sub Sta

111.6m

109.1m

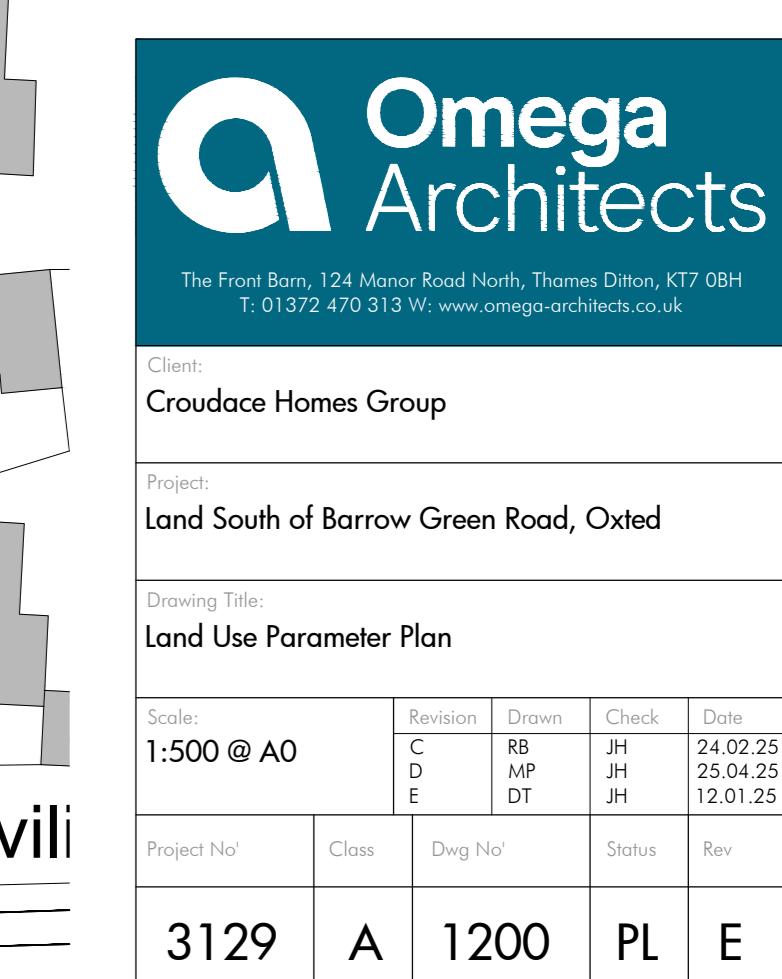
SP

MP 20.0

Grave
Yard

Veterinary Surgery
and Quarantine Kennels

W GREEN ROAD



KEY
PLANNING APPLICATION BOUNDARY LINE
ACCESS POINTS
RESIDENTIAL USE - USE CLASS C3
(TO INCLUDE ROADS & ASSOCIATED INFRASTRUCTURE AND
INCIDENTAL AREAS OF OPEN SPACE)
USE CLASS C2
(TO INCLUDE ROADS & ASSOCIATED INFRASTRUCTURE AND
INCIDENTAL AREAS OF OPEN SPACE)
GREEN INFRASTRUCTURE - TO INCLUDE PUBLIC OPEN AND AMENITY SPACE
(INCLUDING EQUIPPED CHILDREN'S PLAY AREAS, ASSOCIATED LANDSCAPING
AND ECOLOGICAL ENHANCEMENT WORKS; FOOTPATHS, CYCLEWAYS;
DRAINAGE, UTILITIES AND SERVICE INFRASTRUCTURE; EXISTING
TREES/HEDGES; EXISTING DRAINAGE DITCH; GREEN INFRASTRUCTURE MAY
ALSO INCLUDE CROSSING POINTS OF ROADS;)

NOTE: DEVELOPMENT CELLS/ROAD ALIGNMENT CAN DEVIATE BY UP TO 10m UPON
DETAILED DESIGN

PRIMARY ACCESS CORRIDOR TO INCLUDE ROAD, FOOTPATHS, CYCLE PATHS WHERE
NECESSARY, SERVICE MARGINS, VERGES, SUDS WHERE INCLUDED & PRIVATE FRONT
GARDENS.