



Our Local Plan

Green Belt Assessment (Part 3): Exceptional Circumstances and Insetting June 2018

What <u>does</u> this document do?	What this document <u>does not</u> do?
<p>Identifies what the Council consider to be exceptional circumstances in the context of the Tandridge Local Plan.</p>	<p>Does not make alterations to the boundary of the Green Belt, this can only be done through the Local Plan.</p>
<p>Sets out the methodology for assessing exceptional circumstances.</p>	<p>Does not allocate land for development, this can only be done through the Local Plan.</p>
<p>Identifies which sites demonstrate the exceptional circumstances that could justify release from the Green Belt as well as those sites where exceptional circumstances are not demonstrated.</p>	<p>Does not inset settlements from the Green Belt, this can only be done through the Local Plan.</p>
<p>Makes recommendations as to which settlements should be 'inset' from the Green Belt in accordance with Paragraph 86 of the National Planning Policy Framework.</p>	
<p>Provides evidence against which the Local Plan will be cognisant of and prepared.</p>	

Executive Summary

The Green Belt Assessment constitutes an evidence base study that has been prepared to inform and support Our Local Plan. This Green Belt Assessment: Exceptional Circumstances and Insetting (June 2018) constitutes Part 3 of the Green Belt Assessment. It follows on from the Green Belt Assessment (Part 1) (December 2015) and Green Belt Assessment (Part 2): Areas for Further Investigation (October 2016). These documents have considered, at different scales, how land within Tandridge serves the Green Belt purposes and its openness.

The Part 2 Assessment considered 54 Areas for Further Investigation in more depth, having been highlighted within Part 1 as warranting further investigation on various grounds. It concluded by recommending that of the 54 sites investigated, 13 should be considered within Part 3 in terms of whether or not exceptional circumstances exist to justify alterations to the Green Belt. In addition it concluded by recommending that 12 settlements should be considered in Part 3 in terms of whether or not they should be inset and thus excluded from the Green Belt designation.

This Part 3 Assessment comprises the final part of the Green Belt Assessment. It sets out the background to the Green Belt, both locally and nationally, it explains how the Council has assessed sites for exceptional circumstances and the considerations involved in determining which settlements should be inset. It also seeks to explain the principles behind its proposed new Garden Community. It then explains how it has arrived at which sites and settlements have been considered for exceptional circumstances.

Having applied the considerations for insetting settlements, this document recommends that one existing settlement justifies being inset (Godstone). Two other settlements are recommended on the proviso that they are inset only if they form part of the new Garden Community and can thus be made sufficiently sustainable.

Of the 69 sites, comprising housing, Traveller and employment land, considered for exceptional circumstances, 15 housing sites and 3 employment sites are considered to justify exceptional circumstances, and no Traveller sites are considered to justify exceptional circumstances. However, as this document comprises an evidence base study it is not its role to draw up, review or alter Green Belt boundaries or inset settlements nor does it allocate land but it does make recommendations for further consideration through the Local Plan process as part of the wider evidence base.

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1.1 Introduction

Background and context

- 1.1.** This report is the third part of an assessment of the Green Belt in Tandridge. The first two parts of the assessment¹ have included: a consideration of how the Green Belt in Tandridge serves the 5 purposes set out at paragraph 80 of the National Planning Policy Framework (NPPF 2012); a consideration of the strategic concept of the Green Belt; and a historic assessment of if, how and where the Green Belt in Tandridge has changed over time. In addition, the assessment process has considered how the main Green Belt characteristic of openness is demonstrated in the District, including how existing settlements contribute and perform in terms of their openness, in accordance with paragraph 86 of the NPPF. This Exceptional Circumstances and Insetting paper constitutes Part 3 of the wider Green Belt Assessment process and considers the Council's approach to releasing land from the Green Belt and to 'insetting' settlements.
- 1.2.** The wider evidence base, which has been gathered and utilised to inform and prepare the Council's Local Plan and to ensure that the Council has explored all its options in meeting development needs, has developed since the first two parts of the Green Belt assessment were undertaken. Further consideration of the Green Belt is therefore necessary. Furthermore as 94% of the land within Tandridge is designated as Green Belt and given the identified development needs, it is inevitable that the Council would need to look at the Green Belt to see if it is able to assist in delivering homes, jobs and infrastructure, for the future.
- 1.3.** This work has been undertaken to establish whether there is any land, currently designated as Green Belt that demonstrates the exceptional circumstances needed to justify a release from the Green Belt, so it can be utilised to assist in meeting development needs. This paper sets out how the Council has carried out this assessment and the parameters against which the assessment has been undertaken. This paper makes recommendations regarding:
- Sites to be released from the Green Belt,
 - Settlements to be inset from the Green Belt;
 - Alterations to current Green Belt boundaries where relevant; and

¹ The work undertaken to date, including consideration against the 5 Green Belt purposes, can be found in the following documents: Green Belt Assessment (December 2015) and Green Belt Assessment (Part 2): Areas for Further Investigation (October 2016)
<https://www.tandridge.gov.uk/Planning-and-building/Planning-strategies-and-policies/Local-Plan-2033-emerging-planning-policies/Local-Plan-2033/Evidence-base-and-technical-studies>.

- The broad principles for the release of land serving as a new/extended settlement.

1.4. It is important to note that whilst this report makes recommendations that could alter the current Green Belt boundary, it has no remit to formally implement the recommendations and the role of this document is to inform the Local Plan. Any alterations would take place through the Local Plan, following consideration of the wider evidence base.

National context

1.5. National planning policy, including Green Belt policy, is primarily set out in the National Planning Policy Framework 2012 (NPPF), the supplementary policy document, Planning Policy for Traveller Sites 2015 and the Government's Planning Practice Guidance.

1.6. At the heart of the NPPF is a presumption in favour of sustainable development (paragraph 14). Sustainable development is that which best balances economic, social and environmental matters. Paragraph 14 states that for plan-making this means that:

- Local planning authorities should positively seek opportunities to meet the development needs of their area.
- Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless:
 - Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole
 - Specific policies in this Framework indicate development should be restricted.

1.7. The NPPF, at paragraph 47, also aims 'to boost significantly the supply of housing' and states that local authorities should "use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in the Framework, including identifying key sites which are critical to the delivery of the housing strategy over the plan period." As such, the Council, in its preparation of the Local Plan, is obligated to consider all reasonable alternatives and opportunities to meet development needs and to give clear justifications if it cannot do so.

1.8. The NPPF also makes clear the importance attached to the Green Belt. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open, and its essential characteristics are its openness and permanence (paragraph 79). That said policy makes provision for alterations to

the Green Belt and its boundary, be it by releasing land or by insetting settlements as detailed in paragraphs 83 and 86 of the NPPF respectively. It is only through the preparation or review of Local Plans that boundaries of the Green Belt can be changed and this can only be done in exceptional circumstances or where insetting settlements.

1.9. The current NPPF was published in 2012 but the Government has been consulting on revisions, including changes to those parts relevant to the Green Belt. Possible revisions have been mooted through the Housing White Paper - Fixing Our Broken Housing Market (published 07 February 2017) and then most recently in the published draft National Planning Policy Framework, which commenced formal public consultation in March 2018. Publication of the final update to the NPPF is due at the end of July 2018, after the publication of this paper.

1.10. Of particular relevance to this paper and the Council's consideration and approach to the Green Belt is paragraph 1.39 of the Housing White Paper which confirms that "authorities should amend Green Belt boundaries only when they can demonstrate that they have examined fully all other reasonable options for meeting their identified development requirements." It goes on to state that 'reasonable options' refer to demonstrating that Councils have made best use of brownfield and previously developed land, better use of underutilised land, increasing densities and also exploring the ability of other authorities to assist in meeting any unmet needs.

1.11. The draft National Planning Policy Framework 2018 (NPPF 2018) carries the essence of the Housing White Paper forward and proposes a new addition to national Green Belt policy at paragraph 136. Paragraphs 135 and 136 state as follows:

"Once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or updating of plans. Strategic plans should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period. Where a need for changes to Green Belt policies has been demonstrated through a strategic plan, detail amendments to those boundaries may be made through local policies, including neighbourhood plans.

Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic plan-making authority should have examined fully all other reasonable options for meeting its identified need for development. This will be assessed through the examination of the plan, which will take into account the preceding paragraph, and whether the strategy;

- a) makes as much use as possible of suitable brownfield sites and underutilised land;

b) optimises the density of development, including whether policies promote a significant uplift in minimum density standards in town and city centres, and other locations well served by public transport; and

c) has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common ground”.

1.12. It should be noted that this draft amendment to the NPPF 2018 does not lessen or replace the need to demonstrate exceptional circumstances before altering a boundary, and the emphasis on the importance of the Green Belt remains. What it does do, however, is clarify when it is appropriate to consider exceptional circumstances and those considerations that should be had in doing so.

1.13. Further the NPPF 2018, states at paragraph 11 that when addressing the need to apply a presumption in favour of sustainable development “strategic plans should, as a minimum, provide for objectively assessed needs for housing and other development, as well as any needs that cannot be met within neighbouring areas, unless (i) the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason or restricting the overall scale, type or distribution of development in the plan area;...” At footnote 7 it lists the policies referred to within the Framework to which this note applies e.g. land designated as Green Belt and this is placed on the same footing, with the same level of protection, as AONB. However, whilst paragraph 11 of the NPPF 2018, like paragraph 14 of the current NPPF, gives weight to the Green Belt as a consideration in relation to determining whether or not the full OAN can be met, in either instance the NPPF as a whole has to be taken into account in light of the planning system’s purpose of contributing to the achievement of sustainable development (paragraph 6). Although the NPPF (2012) has not yet been superseded, the potential alterations to policies remain a material consideration in plan-making.

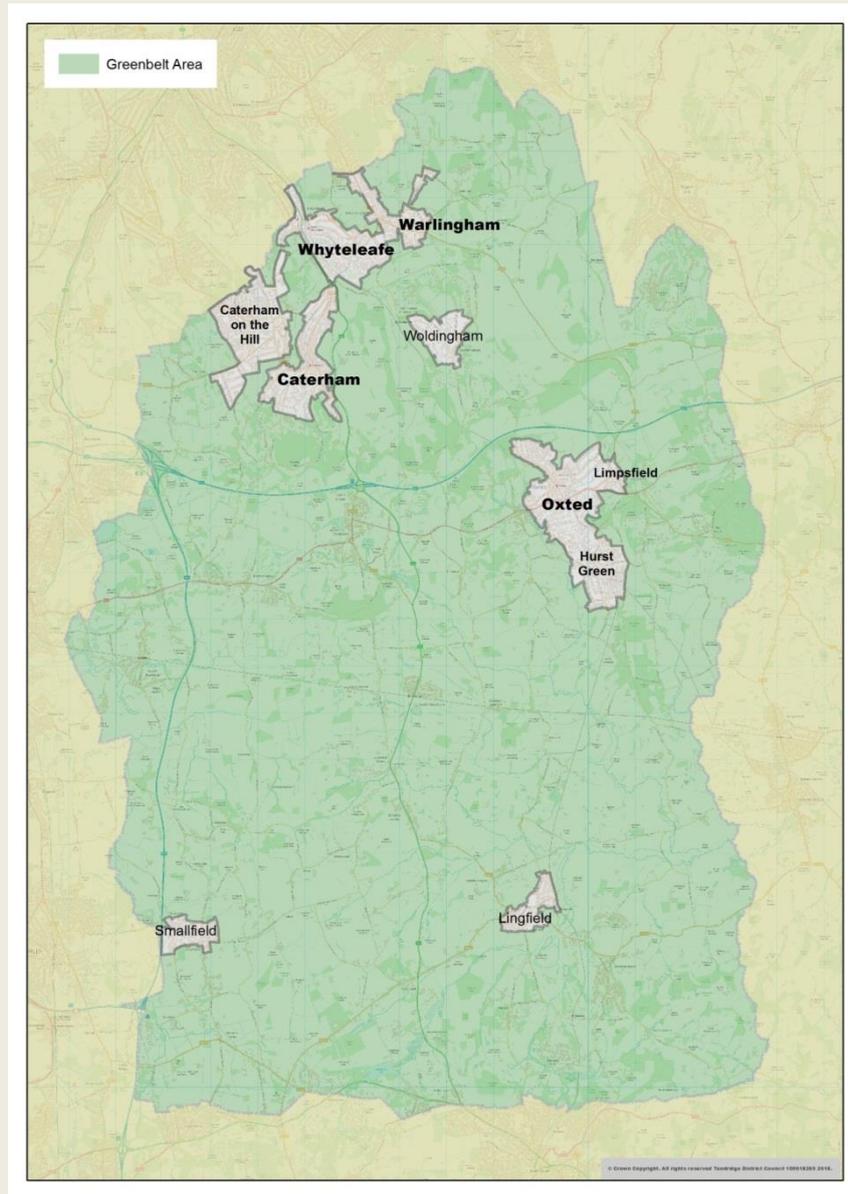
1.14. The Council has looked to make the best use of the 6% of the district that is not within the Green Belt. It has thoroughly examined and exhausted the reasonable options that do not include use of the existing Green Belt. The exhaustion of these other reasonable options and the resultant unmet development need is a contributing factor in the consideration of exceptional circumstances for moving the Green Belt boundaries. Further information is set out in the wider evidence for the Local Plan and the Tandridge Local Plan 2013-2033: Regulation 19 Housing Topic Paper.

Local context

1.15. The Green Belt in Tandridge forms part of the Metropolitan Green Belt around London. In the north of the district it was originally established and adopted through the Surrey Development Plan (1958) and was extended across the

previously developed land where it has been available, including the change of use of commercial space to residential uses via both planning permissions Permitted Development Rights (resulting in the loss of much commercial space), and through back garden development. In addition, some of our smaller Green Belt settlements, where they are designated as Defined Villages in the Green Belt (or previously as Green Belt Settlements), have contributed through infilling and rural exception sites. All other remaining settlements are also in the Green Belt but do not include a defined boundary; as such these do not play in role in providing land supply. This approach has thus far resulted in an oversupply on the annual minimum target of 125dpa.

Figure 2 - The extent of the existing Green Belt in Tandridge District



1.18. This piecemeal pattern of development and minimum delivery target that was out of step with land capacity has meant that infrastructure was not identified in the Core Strategy and its delivery has not kept up with the intensification of our settlements to the detriment of communities. This is not sustainable for the longer term and so piecemeal development should not be relied on as a primary land supply in the future. It is not appropriate or sustainable to continue this approach to development and the emerging Local Plan, supported by the iterative Sustainability Appraisal process, must address this. Once adopted, the Local Plan will replace the Core Strategy (2008) in full.

1.19. As stated previously, this paper is not the first consideration of the district's Green Belt and is in fact Part 3 of a wider assessment process that has been carried out to ensure that the Council has a better understanding of the Green

Belt. The Green Belt Assessment (Parts 1 and 2) and its findings can be found on the Council's website; as such its findings will not be reiterated in this paper.

2.1 Settlements in the Green Belt and Insetting

Background to current policy approach

2.1. The current spatial strategy, including its treatment of existing settlements, is set out within the Tandridge District Core Strategy 2008. The spatial strategy

was determined prior to the publication of the NPPF in 2012 and its treatment of settlements within the Green Belt followed the approach set out in the now revoked Planning Policy Guidance Note 2 – Green Belts. The box below sets out the approach as it appeared in PPG2:

Existing Villages

Development plans should treat existing villages in Green Belt areas in one of the following ways.

If it is proposed to allow no new building beyond the categories in the first three indents of paragraph 3.4, the village should be included within the Green Belt. The Green Belt notation should be carried across (“washed over”) it.

If infilling only is proposed, the village should either be “washed over” and listed in the development plan or should be inset (that is, excluded from the Green Belt). The local plan should include policies to ensure that any infill does not have an adverse effect on the character of the village concerned. If the village is washed over, the local plan may need to define infill boundaries to avoid dispute over whether particular sites are covered by infill policies.

If limited development (more than infilling) or limited expansion is proposed, the village should be inset. Development control policies for such settlements should be included in the local plan.

2.2. The PPG2 approach to insetting was based on whether or not development was proposed in a village or settlement and this was dependent upon whether or not a village or settlement was sufficiently sustainable such that development could be directed towards them. The Council in its draft Core Strategy continued with its long-standing treatment of those of its settlements washed over by the Green Belt, which were then designated as Green Belt Settlements, within which infilling was considered acceptable. However, when examining the draft Core Strategy the Planning Inspector advised that he remained unconvinced that these Green Belt Settlements (many of which had been established in this role for the previous 40 years) were suitable as sustainable locations for future development. His concern centred on the fact that the Sustainability Appraisal did not assess their services and facilities. As such he concluded that the draft Core Strategy did not provide ‘a clear, evidence based, long term vision which balances and considers for each Green Belt Settlement their environmental, economic and social needs....’ and recommended the deletion of the list of Green Belt Settlements and the policies contained within the Local Plan 2001. Instead a policy was included which indicated that Green Belt Settlements and their boundaries were to be reviewed in a future Development Plan Document.

2.3. A review was subsequently undertaken to inform the Detailed Policies 2014 which comprised two stages and which looked at population, functional score,

services and facilities score, proximity to neighbouring towns and car ownership. Whilst this work did not seek to rank settlements, it gave an indication of how sustainable the villages and settlements were in relation to each other, with the larger villages generally scoring better e.g. Bletchingley, Blindley Heath, Godstone. As a result the number of settlements within which limited infilling was acceptable reduced from 14 to 9, with all others not considered sustainable locations². The Planning Inspector considering this Development Plan Document in his report at paragraph 34, acknowledged that the Council had reviewed the categorisation of settlements and that it had heeded the advice of the Inspector who undertook the 2008 Core Strategy Examination. In addition a policy to guide development in these locations was included (DP12) and the terminology changed with these settlements being categorised as Defined Villages in the Green Belt. These settlements are therefore in the Green Belt but limited infilling is considered appropriate development within the defined boundaries.

New policy approach

2.4. The Council is now working on a new spatial strategy within the framework of the NPPF. Section 9 of the NPPF replaced PPG2, and at paragraph 86 it sets out the following:

“If it is necessary to prevent development in a village primarily because of the important contribution which the open character of the village makes to the openness of the Green Belt, the village should be included in the Green Belt. If, however, the character of the village needs to be protected for other reasons, other means should be used, such as conservation area or normal development management policies, and the village should be excluded from the Green Belt.”

2.5. The Council explored paragraphs 83 and 86 of the NPPF in relation to the inseting of settlements in its Spatial Approaches Topic Paper: Sites Consultation (October 2016) <https://www.tandridge.gov.uk/Planning-and-building/Planning-strategies-and-policies/Local-Plan-2033-emerging-planning-policies/Local-Plan-2033/Evidence-base-and-technical-studies>. This considered two ways of looking at the policy position. The first was that inseting is a separate exercise from moving the boundaries of the Green Belt and therefore for inseting, paragraph 86 applies but paragraph 83 does not. The alternative approach was to conclude that paragraph 86 sets out the exceptional circumstances required by paragraph 83. The Council in exploring these two approaches considered that it would not be correct to determine that a settlement does not contribute to openness and then be required to identify

² Settlements considered acceptable for infilling: Bletchingley, Blindley Heath, Dormansland, Felbride, Godstone, Old Oxted, South Godstone, South Nutfield and Tatsfield. Settlements not considered acceptable for even limited infilling: Domewood, Dormans Park, Limpsfield Chart, Nutfield and Tandridge. Settlements not considered acceptable for even limited infilling: Domewood, Dormans Park, Limpsfield Chart, Nutfield and Tandridge.

exceptional circumstances; accordingly the Council's approach will be to assess settlements against paragraph 86.

2.6. Whichever approach is adopted, another difference from the PPG2 approach is the need to consider a settlement's contribution to openness. The fundamental aim of Green Belt policy is to keep land permanently open; and accordingly the essential characteristics of Green Belts are their openness and their permanence. Openness must be considered as distinct from the absence of visual impact as became evident in the case of *R (Lee Valley Regional Park Authority) v Epping Forest DC* [2016], where it was considered that:

"The concept of "openness" here means the state of being free from built development, the absence of buildings – as distinct from the absence of visual impact."

2.7. In addition, in *Timmins v Gelding BC* [2014], the High Court ruled that:

"Any construction harms openness quite irrespective of its impact in terms of its obtrusiveness or its aesthetic attractions or qualities. A beautiful building is still an affront to openness, simply because it exists. The same applies to a building that is camouflaged or rendered unobtrusive by felicitous landscaping."

2.8. However, whilst this seems to be quite a black and white definition, effectively suggesting if there is built form, then it is not open, it is important to use planning judgement particularly as this relates to settlements, which by their nature will comprise built form.

2.9. The openness assessment comprises three stages. The first step is to ask whether a settlement has an open character. Where it has been concluded that it does have an open character, the second step is to assess whether that open character makes an important contribution to the openness of the Green Belt. The third step, if it is concluded that its open character makes an important contribution, is to assess whether it is necessary to prevent development in the settlement for the reason of contribution to openness. Where a settlement has passed each step of the assessment, paragraph 86 states that the settlement should remain washed over by the Green Belt. Where it does not satisfy all three parts of the assessment then paragraph 86 indicates that the settlement should be excluded (inset) from the Green Belt and normal policies would apply.

2.10. Whilst paragraph 86 indicates that those settlements which do not have an open character should be inset, this should be balanced with the reality of implementing such an approach in a dogmatic fashion, and the implications and impact of doing so. Doing so would mean that regard would not be had to the overall thrust of the NPPF which is to achieve sustainable development. It

would lead to the inseting of settlements which are not sustainable, whilst not being able to achieve the levels of development which would improve those settlements' sustainability. Furthermore, whilst some settlements may not have an open character and contain built form, the wider Green Belt would be impacted by reason of its reduced extent, contrary to the fundamental aim of the Green Belt of 'permanence'. Therefore whilst the old PPG2 has been revoked, the policy approach to settlements that was set out in it remains a logical approach to take. As a consequence, whilst a settlement may be assessed as not having an open character, or its open character does not make an important contribution to the openness of the Green Belt, reading the NPPF as a whole, means that it does not automatically follow that a settlement will be inset as, in common with the PPG2 approach, it would not result in sustainable development. Therefore inseting of a settlement will also depend upon its sustainability.

To what extent has inseting settlements been considered, already?

2.11. The Council initially set out its methodology for assessing the Green Belt in its Green Belt Assessment Methodology in 2015 (hyperlink) and section 4.0 of that document lists individual settlements and whether they are inset from the Green Belt, designated as Defined Villages in the Green Belt, or are other Green Belt settlements. A high-level settlement analysis was carried out through the Green Belt Assessment (Part 1) (December 2015) of those settlements identified in the methodology, as well as additional identified settlements.

2.12. Green Belt settlements that, on the basis of the high-level assessment, were found not to be open in character, were recommended for further consideration as Areas for Further Investigation (AFI) in the Green Belt Assessment (Part 2). In relation to a number of these settlements, they formed a part of a larger assessment parcel, or were combined for ease of assessment for Part 2; however it is only the settlement which is of relevance to this section of the Green Belt Assessment. The name of the settlements that were considered are listed below, as well as their reference number in Part 2 of the Green Belt Assessment:

Table 1

Settlement	GBA Part 2 ref no
Bletchingley	AFI 026
Blindley Heath	AFI 033
Domewood.	AFI 038/042
Dormansland	AFI 047
Dormans Park	AFI 046

Felbridge	AFI 041
Godstone	AFI 017
Nutfield	AFI 029
Southern half of Old Oxted (south of A25)	AFI 023
South Godstone	AFI 024
South Nutfield	AFI 030
Tatsfield	AFI 010

2.13. Part 2 considered, in greater detail, the character of these Green Belt settlements on the basis of village form, density and extent of existing developed land and their contribution towards the openness of the surrounding Green Belt. Where Part 2 of the assessment found that an Area did not meet the 3 stage-test of openness, it was recommended that it should be inset in accordance with paragraph 86 of the NPPF. The 12 settlements assessed through Part 2 comprise mostly developed areas and concentrations of built form and accordingly were found not to meet the openness test and were recommended for further consideration in terms of insetting through the Local Plan. Table 1 above lists the settlements that were identified by the Part 2 Assessment as being settlements which could be considered further. This report takes forward the recommendations of the Green Belt Assessment Part 2 to the next stage.

Settlements recommended to be Inset

2.14. The Green Belt work to date, as set out in table 1 above, has identified a number of settlements where it has concluded that they do not have an open character and therefore do not meet the paragraph 86 openness test for remaining ‘washed over’ by the Green Belt. The next step, which this report addresses, is to consider the sustainability of those settlements in order to arrive at a conclusion as to whether or not a settlement should be inset. As part of this work it is considered pertinent to include an explanation of the Council’s rationale for insetting or not insetting various settlements for previous iterations of the Local Plan.

2.15. In 1986, this was undertaken as part of the South of the Downs Local Plan (which did not cover the entirety of the district). It was undertaken in response to the Surrey Structure Plan and support for the release of some land to meet locally generated need. It used a range of criteria, including a steer towards those settlements with shops and community services as being more suitable. As a result, the Larger Rural Settlements of Smallfield and Lingfield were inset based on them being ‘higher order centres’, containing some non-Green Belt uses and having land available with potential for future development. The associated Written Statement also addressed why other settlements, such as Bletchingley and Godstone, should not be included. Stating as follows at page 10:

“Bletchingley is an important village in terms of resident population and local services. However the outstanding Conservation Area status of the village centre and its location within the Area of Great Landscape Value eliminates it from consideration as a large rural settlement to be excluded from the Green Belt. Similarly Godstone has Conservation Areas, a site of special scientific interest and an Area of Great Landscape Value to constrain its future development. The retention of Godstone within the Green Belt is also proposed to give greater protection against anticipated strong development pressures for non-local requirements attracted to the area by proximity to the M25 interchange. Other settlements in the Plan area are not considered to be suitable for designation as larger rural settlements, but will be treated as villages remaining within the Green Belt.”

2.16. Both the 1986 Plan and the South of the Downs Local Plan: First Review in 1994 recognised Godstone as a local service centre, and that it provided services and facilities. The First Review of the South of the Downs Local Plan stated as follows at page 86:

“Godstone, whilst remaining a local service centre has few opportunities for development. Development pressures will no doubt be considerable due to the proximity to the M25 and it is important to retain the Green Belt status if the village character is to be retained.”

2.17. Terms such as ‘sustainability’ and ‘sustainable development’ were not as widely used at that time, however the importance of what services and facilities a settlement contains is a common thread between the work undertaken then and now and is recognised as a factor which contributes to the sustainability of a settlement.

2.18. The sustainability of settlements in the Green Belt also came to the fore during the examination of the Core Strategy in 2008 and work in relation to this was prompted by the Planning Inspector’s comments. It was on the basis of that work, that the most sustainable of the Green Belt settlements (Bletchingley, Blindley Heath, Dormansland, Felbridge, Godstone, Old Oxted, South Godstone, South Nutfield and Tatsfield) were identified as Defined Villages in the Green Belt in the Tandridge Local Plan Part 2: Detailed Policies 2014-2029.

2.19. The Council has subsequently undertaken further work on the sustainability of its settlements, both Green Belt and non-Green Belt, and this can be found in the Settlement Hierarchy 2015 and 2018 Update. This work considered each settlement against a range of Sustainability Indicators and they were then scored and grouped, resulting in a hierarchy. It is based on this work that the Council has determined its spatial strategy, which is to direct development to the most sustainable locations (Tiers 1 and 2). The strategy is not seeking to inset any settlements below Tier 2 as such an approach would reinforce

unsustainable settlements, without providing the scale of development to make these settlements more sustainable. The following assesses each settlement identified in table 1 against their sustainability credentials as set out in the Settlement Hierarchy, before recommending whether or not it should be inset.

Bletchingley

2.20. The Settlement Hierarchy categorises Bletchingley as a Tier 3, Rural Settlement, as it has good access to the strategic road network and bus services and is served by a range of shops, including a post office, public houses, good recreational and community facilities, a primary school and some employment opportunities. Whilst it does not have services in abundance it provides for the day to day needs of the immediate community, but the Hierarchy considers that it would be challenging for this settlement to meet the needs of others in the area. Based on the above factors and the Preferred Strategy it is not being considered for insetting.

Blindley Heath

2.21. The Settlement Hierarchy categorises Blindley Heath as a Tier 3, Rural Settlement. It notes that Blindley Heath benefits from a bus service, community facilities, a local shop, employment opportunities and recreational facilities; as such it meets the criteria for basic provisions. In addition to the bus service it has direct access to the strategic road network and these enable access to better served settlements. Based on the Preferred Strategy it is not being considered for insetting however, it is noted that this is one of the locations being considered for the siting of a new or extended settlement and accordingly it could be considered for insetting on the proviso that it would be sustainable to do so.

Domewood

2.22. The Settlement Hierarchy categorises Domewood as a Tier 4, Limited and Unserviced Settlement. The Hierarchy recognises that Domewood has direct access to the strategic road network but otherwise cannot meet the basic day to day needs of its own residents, with the need to travel to other settlements to provide for those needs. Whilst the Settlement Hierarchy does not assess each of the settlements falling within this category in depth, it draws out the commonalities which result in the conclusion as to their unsustainability. This is the lack of health care provision, the very limited levels of convenience shops, primary education and local employment opportunities and the limited, if present, rail links and bus services. Furthermore, this is supported by the sustainability work undertaken when determining whether or not to designate settlements as Defined Villages in the Green Belt. This concluded that Domewood was not sustainable for even the limited infill development permissible through Green Belt policy. Based on the above factors and the Preferred Strategy it is not being considered for insetting.

Dormansland

2.23. The Settlement Hierarchy categorises Dormansland as a Tier 3, Rural Settlement. The Hierarchy identifies Dormansland as serving a wider area than its immediate community, in particular Dormans Park, and that it meets the criteria for basic services and as such is considered sustainable. However the Settlement Hierarchy recognises that it has experienced closures of local provision and that its services have not been supplemented in response to comprehensive development, with infilling and small scale development incrementally putting pressure on those services. Based on the above factors and the Preferred Strategy it is not being considered for insetting.

Dormans Park

2.24. The Settlement Hierarchy categorises Dormans Park as a Tier 4, Limited and Unserviced Settlement. Whilst the Settlement Hierarchy does not assess each of the settlements falling within this category in depth, it draws out the commonalities which result in the conclusion as to their unsustainability. This is the lack of health care provision, the very limited levels of convenience shops, primary education and local employment opportunities and the limited, if present, rail links and bus services. It does however note that because it has no shops, education, healthcare community facilities, post office or employment opportunities, it ranks beneath all other settlements. Furthermore, this is supported by the sustainability work when determining whether or not to designate settlements as Defined Villages in the Green Belt. This concluded that Dormans Park was not sustainable for even the limited infill development permissible through Green Belt policy. Based on the above factors and the Preferred Strategy it is not being considered for insetting.

Felbridge

2.25. The Settlement Hierarchy categorises Felbridge as a Tier 3, Rural Settlement on the basis of its good access to the strategic road network, bus services, education provision and a range of shops and community services to meet the immediate population and as such meets the criteria for basic services. However it lacks in terms of healthcare provision, although this can be accessed in East Grinstead, as can a wider range of services and facilities. As with other settlements in this category it is considered to be sustainable but demonstrating a basic level of provision and with a reliance on larger settlements for its day to day facilities. Based on the above factors and the Preferred Strategy it is not being considered for insetting.

Godstone

2.26. The Settlement Hierarchy categorises Godstone as a Tier 2, Semi-Rural Service Centre. The Settlement Hierarchy highlights that Godstone has very similar levels of services to Lingfield and Smallfield, and indeed, it is ranked as being in 4th position. This compares to Lingfield in fifth position and Smallfield in seventh position. Its scoring placed it 6 points above these settlements, and only 1 point below Whyteleafe. This is a firm indication of the level and range of services found in Godstone. Further, the Settlement Hierarchy notes that

infilling has allowed it to become physically denser, making the majority of the settlement semi-rural in a similar way to Smallfield and Lingfield. There have been previous challenges to Godstone's Green Belt status, notably through the 1986 South of the Downs Local Plan when 'insetting' was proposed but was resisted to limit the impact of development potentially generated by the completion of the M25. The Settlement Hierarchy indicates that the significance of Godstone as a key settlement has been noted for some time and that whilst steps have been taken to contain it, development has continued to take place and services delivered and accessed. Of particular importance is Godstone's proximity to, and the accessibility of, the strategic road network, comprising the A25, A22 and M25. It is also served by a range of shops, community facilities, a primary school and health care facilities. However it does not have a secondary school, but this is also the case for Smallfield and Lingfield. Godstone does have a regular bus service which assists with accessing secondary schools elsewhere. It also highlights that surrounding settlements also make use of the services and facilities present within Godstone, concluding that Godstone shares similar sustainability levels to Smallfield and Lingfield, which similarly operate as service centres for the wider locale.

2.27. Further, the Planning Inspector who examined the Local Plan Part 2, in addressing third party concerns regarding alterations to the boundary of the Defined Village in Godstone, stated as follows at paragraph 37:

“Elsewhere in Godstone the village boundary is drawn tightly around existing development and although I accept that the land in question is part of the curtilage of Godstone Place there is currently no reasonable justification for its retention within the village boundary. The representor referred to the sustainability credentials of Godstone and I saw some of the services that are available during my visit. However, at the current time there is no substantive evidence that land in the village is required to meet housing needs. Should the situation change during the preparation of LP1 then there is no reason to doubt that the Council would consider whether or not Godstone should have a role in accommodating any development but until that consideration has been undertaken the Council's approach is sound.”

2.28. It is considered that based on Godstone's long-standing sustainability credentials, that it be considered for insetting.

Nutfield

2.29. The Settlement Hierarchy categorises Nutfield as a Tier 4, Limited and Unserviced Settlement. This settlement was grouped with Bletchingley when assessed through the Hierarchy, which considers that Nutfield does not perform as well, not having the same levels of community facilities and lacking a local convenience shop, with a need for residents to gain access to basic level of services elsewhere on a frequent basis. Its access to the strategic road network and bus routes were noted however, it scored less well than

Bletchingley. As such it is not considered to be sustainable. Based on the above factors and the Preferred Strategy it is not being considered for insetting.

Southern half of Old Oxted

2.30. The Settlement Hierarchy categorises Old Oxted as a Tier 3, Rural Settlement in recognition of its access to a bus service, community and recreational facilities and local shopping provision, such that it meets the basic fundamentals in order to be considered sustainable. Its proximity to Oxted and its services are acknowledged, however so is the role of the A25 in segregating Old Oxted from Oxted and leading to a need to use a car to access those services and facilities. Also of importance is that from a pragmatic point of view, it would never make sense to inset what amounts to only half of a settlement. Based on the above factors and the Preferred Strategy it is not being considered for insetting.

South Godstone

2.31. The Settlement Hierarchy categories South Godstone as a Tier 3, Rural Settlement. This is on the strategic road network, and has access to the railway line. The Hierarchy also consider that it has a good range of community facilities, a small number of local shops, a primary school and recreational facilities. In addition Lambs Business Park contributes to local job opportunities. However residents have to seek healthcare, secondary school and a wider range of retail elsewhere. Given its current sustainability credentials, it would not accord with the Preferred Strategy however, it is one of the locations being considered for the siting of a new or extended settlement and accordingly it could be considered for insetting on the proviso that it would be sustainable to do so.

South Nutfield

2.32. The Settlement Hierarchy categorises South Nutfield as a Tier 3, Rural Settlement on the basis that it meets the criteria for basic services, including a primary school, local shop, a good range of community and recreational facilities, and in addition is located on the Redhill to Tonbridge train route. However it acknowledges that it is set away from the A25, does not have any healthcare provision and requires residents to go further afield to supplement its basic provisions. Based on the above factors and the Preferred Strategy it is not being considered for insetting.

Tatsfield

2.33. The Settlement Hierarchy categorises Tatsfield as a Tier 3, Rural Settlement. It notes its rural character and that it can demonstrate a basic level of services, with good community facilities, local shops and education provision but that it is not directly connected to the strategic road network. It also notes its likely reliance on commercial areas and secondary education provision in areas outside of this district, as well Oxted. Based on the above factors and the Preferred Strategy it is not being considered for insetting.

Conclusion

2.34. As Godstone lacks an open character and has superior sustainability credentials compared to either that of Lingfield or Smallfield, it is recommended that Godstone be considered for insetting as part of the wider Local Plan work and having regard to the wider Local Plan evidence base. Whilst other settlements similarly do not exhibit an open character, however in light of the work undertaken through the Settlement Hierarchy they do not offer sustainable locations for further development above and beyond that which can currently be secured; as such no other settlements are being recommended. Although, in light of the proposed new or extended settlement being considered at either Blindley Heath or South Godstone, it is considered that, whichever is the preferred location, should also be considered for insetting on the proviso that it would be sustainable to do so.

What does insetting mean in real terms?

2.35. The concept of insetting is one of policy compliance as per paragraph 86 and so it is about the built form that makes up an existing settlement and whether the settlement contributes to openness. That said, whilst it is argued that paragraph 86 can be considered independently of paragraph 83, it must still be considered alongside the policies of the National Planning Policy Framework as a whole and therefore, as detailed above, insetting also takes into account the issue of sustainability. Consequently the driving force behind determining whether or not to inset a settlement is policy compliance and sustainability, not whether insetting itself can contribute to development needs.

2.36. It is acknowledged that where a settlement is inset, it would no longer be within the Green Belt and therefore not subject to restrictive Green Belt policies. However, Green Belt policies do make provision for small scale development in the form of limited infilling and limited affordable housing for the local community in those settlements that remain within the Green Belt, and which are designated as Defined Villages in the Green Belt. Those settlements without this designation have the type and amount of development considered appropriate further restricted (over and above that of Defined Villages). Clearly within inset settlements, development beyond limited infilling may be acceptable. Whilst insetting would allow for a greater level of development, any such development would still be subject to planning policies. It is through these planning policies that the Council, as Local Planning Authority, would seek to ensure that only development appropriate to the character and appearance of that settlement is permitted. Policies would also manage development to ensure that locally specific issues are taken into account and addressed, so that any harm or impact which arises is not materially greater than the existing situation.

3.1 Exceptional Circumstances Considerations

How are exceptional circumstances being determined?

- 3.1.** The NPPF stipulates at paragraph 83 that Green Belt boundaries should only be altered in 'exceptional circumstances'. This is a different and separate approach to removing settlements from the Green Belt, which is covered at section 2.1.

- 3.2.** This section sets out the methodology the Council has used to assess the existence (or not) of exceptional circumstances it feels are a consideration for the local Green Belt. Similarly, these same considerations are utilised to justify why land should not be released, meaning that the designation would be retained.

3.3. Neither the NPPF nor the associated Planning Practice Guidance defines or provides guidance as to what circumstances are exceptional. The use of the word 'exceptional' is not incidental and by default explains why little guidance is available to affected plan-making authorities primarily due to the fact that each Green Belt authority will have their own issues to overcome, their own opportunities to maximise and therefore their own set of potentially exceptional circumstances.

3.4. In order to understand what factors could constitute exceptional circumstances, the Council in its Spatial Approaches Topic Paper: Sites Consultation (October 2016) <https://www.tandridge.gov.uk/Planning-and-building/Planning-strategies-and-policies/Local-Plan-2033-emerging-planning-policies/Local-Plan-2033/Evidence-base-and-technical-studies> looked at different sources for information (Section 11 of that document). Consideration was given to case law, the NPPF, the Planning Practice Guidance and the House of Commons Briefing Paper on the Green Belt dated 5th January 2016. From these documents the following 6 conclusions were drawn:

- a. To move a Green Belt boundary it is necessary to identify exceptional circumstances. It is not sufficient to simply say that moving the boundaries is desirable in the planning balance.
- b. It is not necessary, at least when seeking to take sites out of the Green Belt, to show that the assumptions on which the Green Belt had been made at that location have since been falsified.
- c. The simple act of carrying out a local plan assessment/review of the Green Belt will not be sufficient to amount to exceptional circumstances. That would not accord with the point in the NPPF that Green Belt boundaries are meant to be permanent and endure beyond any individual plan period.
- d. The fact that a particular site in the Green Belt is suitable for housing (or other development) is unlikely on its own to amount to an exceptional circumstance, but would contribute to a finding of exceptional circumstances as part of a package of measures.
- e. Unmet objectively assessed need can contribute to a finding of exceptional circumstances but is unlikely on its own to justify a conclusion that exceptional circumstances have been identified.
- f. Unmet objectively assessed need cannot require an authority to move the boundaries of the Green Belt (which would chime with the approach of paragraph 14 of the NPPF which requires objectively assessed needs to be met unless specific policies in the Framework, including Green Belt policies, indicate development should be restricted). However, if an authority has unmet objectively assessed need it is necessary to show through their sustainability appraisal and other assessments why it would not be appropriate to move the Green Belt boundaries in a particular case.

3.5. In terms of what matters should be considered in relation to exceptional circumstances the Spatial Approaches Topic Paper: Sites Consultation (2016)

set out the Council's understanding, at that point in time, of what considerations could constitute exceptional circumstances. It highlighted in particular the case of *Calverton Parish Council v Greater Nottingham Councils* [2015] EWHC 10784. This remains the latest available case law on the matter of exceptional circumstances. It sets out that the planning judgements involved in the consideration of exceptional circumstances in the context of both national policy and the positive obligation located in section 39(2) of the Planning and Compulsory Act 2004 should, at the very least, identify and grapple with the following matters;

- i. the acuteness/intensity of the objectively assessed need (matters of degree may be important);
- ii. the inherent constraints on supply/availability of land prima facie suitable for sustainable development;
- iii. (on the facts of this case) the consequent difficulties in achieving sustainable development without impinging on the Green Belt;
- iv. the nature and extent of harm to this Green Belt (or those parts of it which would be lost if the boundaries were reviewed); and,
- v. the extent to which the consequent impacts on the purposes of the Green Belt may be ameliorated or reduced to the lowest reasonable practicable extent.

3.6. The Topic Paper also set out that the Council would apply these tests to what were described as Category 2 and 3 sites at the appropriate time in the plan-making process. These categories were used to differentiate sites as part of the Council's *Our Local Plan: Sites Consultation* (4 November to 30 December 2016); with Category 2 sites being those identified as not serving Green Belt purposes whilst Category 3 sites identified as serving one or more Green Belt purpose. The Topic Paper suggested that points (i) to (iii) of the *Calverton* case would be applied at site level, however, as these matters are strategic in nature, affecting the district as a whole, it is considered more appropriate to assess them within the main body of this report and not at site level, although they are included when balancing factors for or against a site. However, matters (iv) and (v) have been considered at site level through individual site pro formas (which form an appendix to this report) as each site will vary in terms of how well they perform in relation to the Green Belt purposes applicable to them, the extent of harm arising from their development and the potential for mitigation. The Topic Paper concluded that there would be a need to give clear consideration to points (iv) and (v) of the *Calverton* case where a site serves Green Belt purposes and furthermore, that these sites would require additional justification.

3.7. Since the *Sites Consultation* and as mentioned in section 1 of this report, the Government in March 2018 published the draft NPPF for consultation, which sets out three areas that should be considered before it can be concluded that exceptional circumstances exist to justify a boundary change:

- makes as much use as possible of suitable brownfield sites and underutilised land;
- optimises the density of development, including whether policies promote a significant uplift in minimum density standards in town and city centres, and other locations well served by public transport; and
- has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common ground”.

3.8. These are also strategic in nature and are key considerations that assist in determining that the Council has assessed point (i –v) above, but also logically precede consideration of whether or not exceptional circumstances exist. Therefore the first step is to consider alternative available land supply in order to both demonstrate the need to consider land in the Green Belt and in order to reduce the impact on the Green Belt to the lowest reasonable practical extent.

3.9. The Tandridge Local Plan 2013-2033: Regulation 19 Housing Topic Paper and the Sustainability Appraisal (Regulation 19 – 2018) includes detailed consideration and exploration of these reasonable alternatives. It demonstrates that there is a limited amount of suitable brownfield sites, the optimum densities have been considered and assessed (particularly around transport hubs), and that our neighbouring authorities sit within different Housing Market Areas, assisting with other unmet from elsewhere first , or cannot meet their own need due to their constraints.

3.10. With this in mind, whilst at the time of writing the revised NPPF remains in draft, it is evident that the Council meets the criteria for demonstrating a legitimate need to consider land in the Green Belt for development further and this GBA Part 3, undertakes this work. The following addresses the matters highlighted by the Calverton case at a strategic level. Where there is a need for site specific consideration, these matters have been assessed in more detail through the site pro formas.

3.11.1) The acuteness/intensity of the objectively assessed need

3.11. In considering the acuteness and extent of need in the district for the purposes of this assessment case law provides that it relates solely to the objectively assessed need for housing. Further detail on supply matters is set out in a separate Tandridge Local Plan 2013-2033: Regulation 19 Housing Topic Paper, but a summary is set out below for the context of this assessment.

3.12. The calculation of an objectively assessed housing need is a requirement of the plan-making process. The Council undertook this in 2015 and identified an

objectively assessed need (OAN) for 9,400 homes over the plan period (2013-2033) or 470 units annually; this did not include any uplift for affordability.

3.13. Since the preparation and publication of the Council's SHMA and associated OAN, the Government has proposed a standard methodology for calculating need in its consultation paper Planning for the right homes in the right places (September 2017). The consultation paper, in addition to identifying a method for calculation which is different from that of the current approach set out in the NPPF and Planning Practice Guidance, presented the housing need figure for each Local Authority across the country using the new method. The proposed methodology includes an uplift where median house prices are over 4 times the median earnings of those working in the local authority area. This is the case in Tandridge. Using the standard methodology the OAN for Tandridge would be 645 dwellings per annum over a 10 year period (2016 – 2026). However, this standard methodology has yet to be formally agreed by the Government. That said, and despite receiving much criticism from councils throughout England, it has remained in the draft NPPF and PPG, published in March 2018.

3.14. In addition to establishing the OAN, in 2015 the Council also undertook an affordable housing assessment, as of the Strategic Housing Market Assessment (SHMA), which set out a backlog in affordable housing, producing a net need for 456 units per annum over the first five years of the plan and 284 affordable homes annually for the remainder of the plan period. Since this date, the Council have updated the affordable housing element of the SHMA, resulting in a need for 391 units per annum over the first five years of the plan and 310 thereafter.

ii) The inherent constraints on supply/availability of land prima facie suitable for sustainable development

3.15. Point i) focuses on the acuteness of objectively assessed need, in line with case law, and not on other development needs. However, it is more than housing alone that justifies consideration of exceptional circumstances and therefore it is important to consider the other development needs within the District, before we can understand the availability of land and its contribution to sustainable development.

3.16. Accordingly the Council has gathered evidence that identifies the local need for different types of development (housing, employment land and Traveller sites) over the plan period (2013-2033). The need for housing has already been addressed in the previous section and therefore this section only includes summaries of the district's need for Traveller sites and employment land. It is important to this matter as they contribute towards the provision of sustainable

development but it also helps in understanding the extent of development pressures on land across the district.

Travelling Community

3.17. The need for homes extends to the Travelling community, who also need to be accounted for when considering future needs. National policy places a requirement on local authorities to accommodate the travelling community, where need exists. The Gypsy and Traveller Accommodation Assessment (GTAA) 2017 has assessed Traveller needs up to 2033 in light of the new planning definition set out in Planning Policy for Traveller Sites (PPTS) (2015), and it has identified a confirmed need for 5 additional Gypsy and Traveller pitches and 21 additional Travelling Showpeople plots.

Employment

3.18. The development needs of an area extend beyond that for homes and traveller sites, and a sustainable and holistic Local Plan will ensure sufficient provision of local job opportunities and support for businesses, where it is needed, is part of the plan. Local employment provision is an important element of sustainable development and contributes to both local and wider prosperity, whilst also limiting the need for people to commute.

3.19. The Economic Needs Assessment (ENA) Update 2017 has estimated the baseline demand for floor space and land required for office, industrial and warehouse/distribution; the breakdown of this is set out below. Whilst the amount forecast to be needed does not directly translate into land, as provision could be made 'over the shop' and through multi-storey facilities, it gives an indication of the demands that are placed on the requirement for space in general to meet future needs:

Figure 3 - Baseline scenario

Employment Use	Sq m needed	Hectares
B1a/b: Office	27,000	8.6
B1c/B2: Industrial	8,000	2.0
B8: Warehouse/ Distribution	23,000	4.7
Total B-Class Uses	58,000	15.3

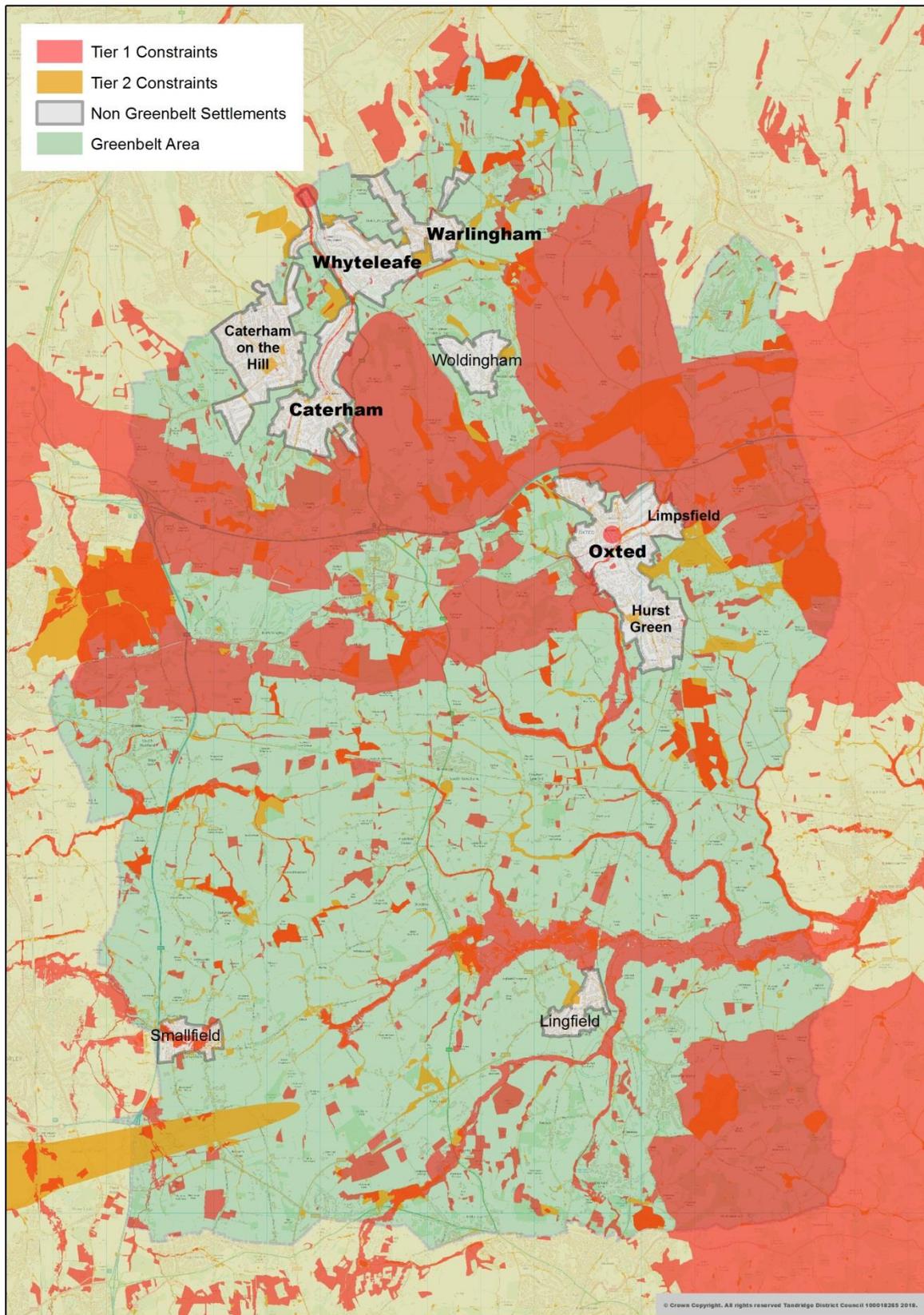
3.20. These uses are all competing for available land that is, on the face of it, appropriate for sustainable development. In order to establish where land meets this requirement, the Council has considered sustainable locations for development through its Settlement Hierarchy (2015 & 2018 refresh). The Hierarchy identified settlements with good access to services, employment,

facilities, the strategic road network and public transport as being the most sustainable and therefore the ones capable of accommodating development in the first instance. The Hierarchy was reviewed in 2018 to ensure that the settlement tiers remained accurate. In its top tier, i.e. those which are most sustainable and categorised as Urban Settlements (Tier 1), are Caterham on the Hill, Caterham Valley, Hurst Green, Limpsfield, Oxted, Warlingham and Whyteleafe. Less sustainable but still providing for the day-to-day needs of local residents with access to a range of facilities, are the Semi-Rural Service Settlements (Tier 2), comprising Godstone, Lingfield and Smallfield. Aside from Godstone, these are all inset from the Green Belt in the current Local Plan, being either built up or designated as Larger Rural Settlements.

3.21. Furthermore, the district contains inherent constraints which place further limits primarily in relation to the expansion of settlements. The Spatial Approaches Topic Papers 2015 and 2016 identified 3 levels of constraints. Tier 1 comprises environmental/physical constraints which the Council considers are a major barrier to the delivery of development and are the highest level of constraint. They include Flood Zone 3, Landfills/Minerals, Significant Hazardous Installations, Areas of Outstanding Natural Beauty (Surrey Hills in the north and High Weald in the south-east), including AONB Candidate Areas and Ancient Woodland. Where present, these constraints cover significant portions of the northern third of the district, which also coincides with the location of the district's most sustainable and largest settlements. They are also present across the remainder of the district but in a more sporadic and pocketed fashion, with the exception of the flood risk across the centre of the district and the area of the High Weald AONB in the south-east corner. The AONB in the north of the district in particular contains in part key settlements, with the potential for the AONB Candidate Areas to further restrict land adjacent to sustainable settlements. Furthermore, the district contains extensive countryside, whilst the settlements of Smallfield and Lingfield to the south are severely constrained by Flood Zones 3a and 3b.

3.22. Tier 2 constraints are those considered to be a significant barrier to development but where there is a more reasonable chance of mitigation, albeit that mitigation may be at a significant cost or could only be delivered over a significant timescale, and therefore in essence they preclude development. They include Sites of Special Scientific Interest, Scheduled Monuments, Sites of Nature Conservation Interest, Regionally Important Geological Sites, Surface Water Flooding, Local Nature Reserves, the Gatwick Public Safety Zone, Historic Parks and Gardens, Local Green Spaces (identified through Neighbourhood Plans), LEQ noise contours (over 60 decibels), Common Land and Village Greens and Biodiversity Opportunity Areas. These cover more contiguous and less fragmented areas. In addition, it is important to note that some settlements to the north of the district are bound by the administrative boundaries shared with other local authorities. The following map shows both the Tier 1 and Tier 2 constraints in relation to the district's non-Green Belt settlements.

Figure 4 – map illustrating Tier 1 and Tier 2 constraints within the district.



3.23. The Council has therefore sought to identify a supply of land with the potential to provide development in sustainable locations and which is free from inherent constraints. The Sustainability Appraisals (SA) for the Regulation 18 Local Plans: Issues and Approaches (2015) and Sites Consultation (2016) and the Preferred Strategy (2017) set out how available and suitable land supply contributes to the delivery of sustainable development. In summary, there is a finite amount of non-constrained (or the constraints cannot be overcome) land available for competing development needs that can contribute to sustainable development. The Tandridge Local Plan 2013-2033: Regulation 19 Housing Topic Paper also considers the opportunity for available land to contribute towards meeting need and the necessary balance with providing employment and Traveller needs in a sustainable way. The paper recognises that the quantum of land supply available for meeting the district's development needs in sustainable locations is extremely limited, with land supply exhausted within the non-Green Belt settlements and the low density character of the district making the use of land at significantly higher densities difficult.

iii) The consequent difficulties in achieving sustainable development without impinging on the Green Belt;

3.24. The NPPF sets out that the purpose of the planning system is to contribute to the achievement of sustainable development and that there are three dimensions to it; economic, social and environmental. It states that these are mutually dependent and that economic, social and environmental gains should be sought jointly and simultaneously in a balanced manner.

3.25. The Council explored six approaches to provide the district's development needs through its Issues and Approaches consultation in 2015; three of these did not impinge on the Green Belt.

- Approach 1 was a 'do nothing' approach based on development built out or granted permission since 2013.
- Approach 2a considered sites within the inset areas of the district at a density of 30 dwellings per hectare and the intensification of existing employment sites within inset areas.
- Approach 2b considered sites within the inset areas of the district at a density of 70 dwellings per hectare and the intensification of existing employment sites within inset areas.

3.26. At that point in time (2015) 1531 dwellings had either been built or permitted since 2013, when the plan period for the Local Plan commenced, with no increase in employment. Approach 2a would have allowed for 2336 dwellings and 3.2 ha of employment, whilst Approach 2b would have resulted in 3403 dwellings and 3.2 ha of employment. This is set against an OAN of 9400 and a need for 15.3 ha of employment land as identified through the Economic Needs Assessment.

3.27. Approach 1 was not considered a reasonable alternative as it was only a baseline position at the time and therefore was not assessed through the SA. In relation to Approaches 2a and 2b, the SA concluded that they both scored very poorly in terms of providing sufficient suitable and affordable housing, with both falling significantly below the district's objectively assessed need and with limited scope to provide affordable housing. Furthermore, they performed poorly in terms of supporting economic growth and providing employment opportunities. In addition, whilst considered likely to have a neutral/negligible impact in relation to the health and wellbeing of the whole population, a concern remains that in the long term the cumulative impacts would increase pressures on services and facilities, leading to a negative impact. Therefore whilst these approaches performed well in relation to the environmental objective, and would not impinge upon the Green Belt, they performed poorly in relation to the economic and social objectives.

3.28. Approaches 3, 4 and 5 included sites in the Green Belt, with Approach 6 considering a large urban extension or new settlement. The spatial strategy chosen combines Approaches 3 and 6. Both scored well in terms of providing sufficient suitable and affordable housing, with Approach 6 noted as providing the potential to make some significant financial contributions to deliver the required level of infrastructure and mitigate the negative impacts. Approach 3 is also considered to perform well in relation to air quality given it will site development with easy access to services and facilities, although Approach 6 could be harmful if it resulted in a car orientated community. However, neither performs well in terms of making best use of previously developed land and existing buildings nor in terms of the loss of soil quality and quantity, whilst Approach 6 has the potential to have a negative impact on surrounding landscape and biodiversity. The development of Green Belt land and its consequences for sustainable development have therefore also been considered in the balance, and whilst Approaches 3 and 6 include some potential for harm in relation to the sustainability objectives, these impacts are also considered to be largely mitigatable and thus their impact could be minimised to the lowest level practicable.

3.29. In the draft NPPF and recent Government publications such as the Housing White Paper, there is an emphasis on considering reasonable alternatives such as brownfield land before justifying exceptional circumstances. Purpose 5 of the Green Belt purpose also establishes this point in requiring Green Belt land to assist in urban regeneration, by encouraging the recycling of derelict and other urban land. The Council has considered a number of brownfield sites, looking at estate renewal and town centre regeneration through our sheltered housing review and Oxted Regen and Caterham Masterplan respectively. Whilst the Tandridge Local Plan 2013-2033: Regulation 19 Housing Topic Paper sets out the consideration of regeneration and the use of derelict land to assist with land supply, ultimately the same conclusion is arrived at in that there

is a finite amount of urban land and inevitably Green Belt land must be explored to support sustainable development.

iv) The nature and extent of the harm to the Green Belt (including the wider Green Belt) and those parts of it which would be lost if the boundaries were reviewed

3.30. In considering the nature and extent of the harm to the Green Belt, the conclusions of the Green Belt Assessment Parts 1 and 2 are key considerations. These assessed the Green Belt within Tandridge at a strategic level, with a more granular assessment of the Areas for Further Investigation (AFI) through Part 2. Part 2 considered the openness of these AFIs, the Green Belt purposes they served and how well they served them. Having considered these matters, Part 2 concluded with a recommendation as to which AFIs should be considered further in relation to exceptional circumstances. For those areas, where it has been concluded that it effectively meets at least one of the Green Belt purposes, Part 2 recommends that those areas are not considered further as part of the Green Belt Assessment. However, it acknowledged that these areas may be considered further in terms of exceptional circumstances as part of the Local Plan process. Whilst this document forms part of the Green Belt Assessment, its role is to consider sites and the existence of exceptional circumstances.

3.31. The Council generally considers development that would not result in harm to the land's ability to serve the purposes may, however, impact upon the openness of the Green Belt. The pro formas include an assessment of the nature and extent of harm to the Green Belt if the site is developed, both in relation to the site itself and the likely impact on the ability of the wider area to meet the Green Belt purposes, if developed.

3.32. However, for those sites that have been identified as meeting at least one Green Belt purpose, the Council recognises that there would be harm to the land's ability to serve the Green Belt purposes. In addition there may be potential harm to the wider Green Belt should they be developed. The greater likely harm to the Green Belt is recognised and considered in the planning balance.

Accordingly, in applying the exceptional circumstances test, the Council has considered:

- Harm resulting from the lost ability of the land to serve one or more of the Green Belt purposes; and
- The impact on the ability of the wider Green Belt to meet Green Belt purposes and to contribute to openness, if developed.

3.33. This has been undertaken on a site by site basis, as each site varies in its contribution to the purposes and will have a different relationship with built up

areas, the topography of the land, landscape features and in terms of the scale of development and the location and form of the site.

3.34. Both Parts 1 and 2 of the GBA were undertaken prior to the Planning Inspector's interim comments on the Welwyn Hatfield Local Plan dated December 2017. In the Inspector's comments he drew attention to the fact that when undertaking a more finely grained assessment of sites, Welwyn Hatfield incorporated an examination of landscape consideration into the consideration of openness. The Inspector made it clear that openness is about the absence of built development and other dominant urban influences and that openness considerations should not be concerned about the character of the landscape. Similar to Welwyn Hatfield, Tandridge has had a Landscape Sensitivity and Capacity Study undertaken, however this has not formed part of the assessment within Parts 1 or 2 of the Green Belt Assessment. However, it has been used to aid consideration in this Part 3 assessment, as it includes consideration of a site's contribution to the separation between settlements, its contribution to the setting of surrounding landscape and visual sensitivity, which have a degree of overlap with Green Belt purposes and gives an indication of a site's impact on the Green Belt purposes, both directly and in relation to the wider Green Belt. That is, the landscape assessment evidence has been used to deal with matters beyond openness.

3.35. The assessment for each site is set out within the pro formas at appendices.

v) The extent to which the consequent impacts on the purposes of the Green Belt may be ameliorated or reduced to the lowest reasonably practicable extent

3.36. This principle is reflected in the draft NPPF which is currently out for consultation. Paragraph 137 of the draft NPPF 2018 sets out that where it has been concluded that it is necessary to release Green Belt land for development, plans should set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land.

3.37. This test follows on logically from the foregoing test which requires an understanding of which Green Belt purposes would be impacted by the development of a site and an understanding of the extent and nature of any harm. This has been undertaken for each site through the site pro formas, and has also made use of the Tandridge Landscape Capacity and Sensitivity Study 2016, to include potential for mitigation.

3.38. The Council considers that in most instances the use of good design and an effective master planning process can help mitigate impacts on the openness of the Green Belt and its purposes, for example by reducing visual or perceptual coalescence, preventing a sense of urban sprawl or tying development into the landscape of the wider countryside and accommodating open space within the site. The attached pro formas address whether the use

of good design would help achieve this aim and the extent to which the impact would be ameliorated or reduced to the lowest practicable extent.

3.39. Any sites that may be allocated in the Local Plan would be expected to mitigate the loss of Green Belt land by maintaining any physical boundaries that provide visual and functional separation to the Green Belt and enhance these where possible. This could be achieved by incorporating effective buffer zones, habitat creation and landscaping schemes and the creation of appropriate transitions. Further, edge of settlement sites would be expected to respond in scale, layout, materials and landscaping to the local character of both the settlement and their setting, reflecting the identity of the locality to ensure they endure beyond the plan period.

Locally derived considerations

3.40. In addition to identifying and working with the Calverton principles, the Council is mindful that the term ‘exceptional circumstances’ indicates the circumstances justifying the release of land from the Green Belt must be exceptional, as well as being locally pertinent. Therefore in addition to the principles arising from the Calverton case, the Council has undertaken a locally derived approach to exceptional circumstances.

3.41. Each site includes consideration of the conclusions arising from Parts 1 and 2, where applicable, i.e. the conclusions around openness, the purposes a site serves and whether it should be considered further in relation to exceptional circumstances, in addition to consideration against the matters (iv) and (v) from the Calverton case, so the nature and extent of the harm and whether the impacts can be ameliorated or reduced to the lowest reasonably practicable extent. Where a site was not considered in detail through Part 2 as it did not fall within an Area for Further Investigation, a more finely grained assessment has been undertaken in order to be clear as to which purposes, if any, would be affected and the extent and nature of that impact etc.

3.42. In addition it includes an assessment of how sites have performed in relation to the wider evidence base. Therefore it has looked at whether a site is strategy compliant, ecologically suitable, whether the landscape has capacity, whether it would result in the loss of open space or sports facilities, whether the Sustainability Appraisal considers a site to be in a sustainable location, whether a site is at risk of flooding or whether there are any other water related issues, and whether any identified issues could be mitigated. It has used the following evidence base documents in its assessment.

- Landscape Capacity and Sensitivity Study October 2016 and subsequent iterations (2017 and 2018)
- Sustainability Appraisal October 2016 (Updated in 2018)
- Site Based Ecology Assessments 2016 and subsequent iterations (2017 and 2018)
- Preferred Strategy 2017

- Strategic Flood Risk Assessment (2017 and 2018)
- Employment Needs Assessment (2015 and 2018)
- Infrastructure Delivery Plan 2018
- Tandridge District Open, Sport and Recreation Facilities Assessments

3.43. Furthermore, a vital part of the assessment is whether there would be any harm arising that would be difficult to mitigate (too costly, take too long, mitigation more harmful than development) or whether it would provide opportunities for community benefits associated with the site's development. As identified, one of the fundamental issues facing the district has been the effect of piecemeal development over a number of years. This has been a key concern highlighted throughout the Council's consultation process by members of the public. The Council's Preferred Strategy was drawn up having regard to this issue and accordingly part of that strategy for meeting development needs is through:

- An infrastructure-led approach that ensures new development is capable of delivering infrastructure improvement to meet the needs of the existing and future population throughout the plan period.

3.44. Accordingly the Council's consideration of exceptional circumstances has included whether or not the development of a site includes wider community and social benefits. Community benefits are those benefits that would help address existing issues or provide improved facilities for the immediate or wider community, e.g. flood alleviation measures, education and health provision and other infrastructure. These have been derived from the Council's Infrastructure Delivery Plan (2018) and other benefits the evidence base highlights could be secured.

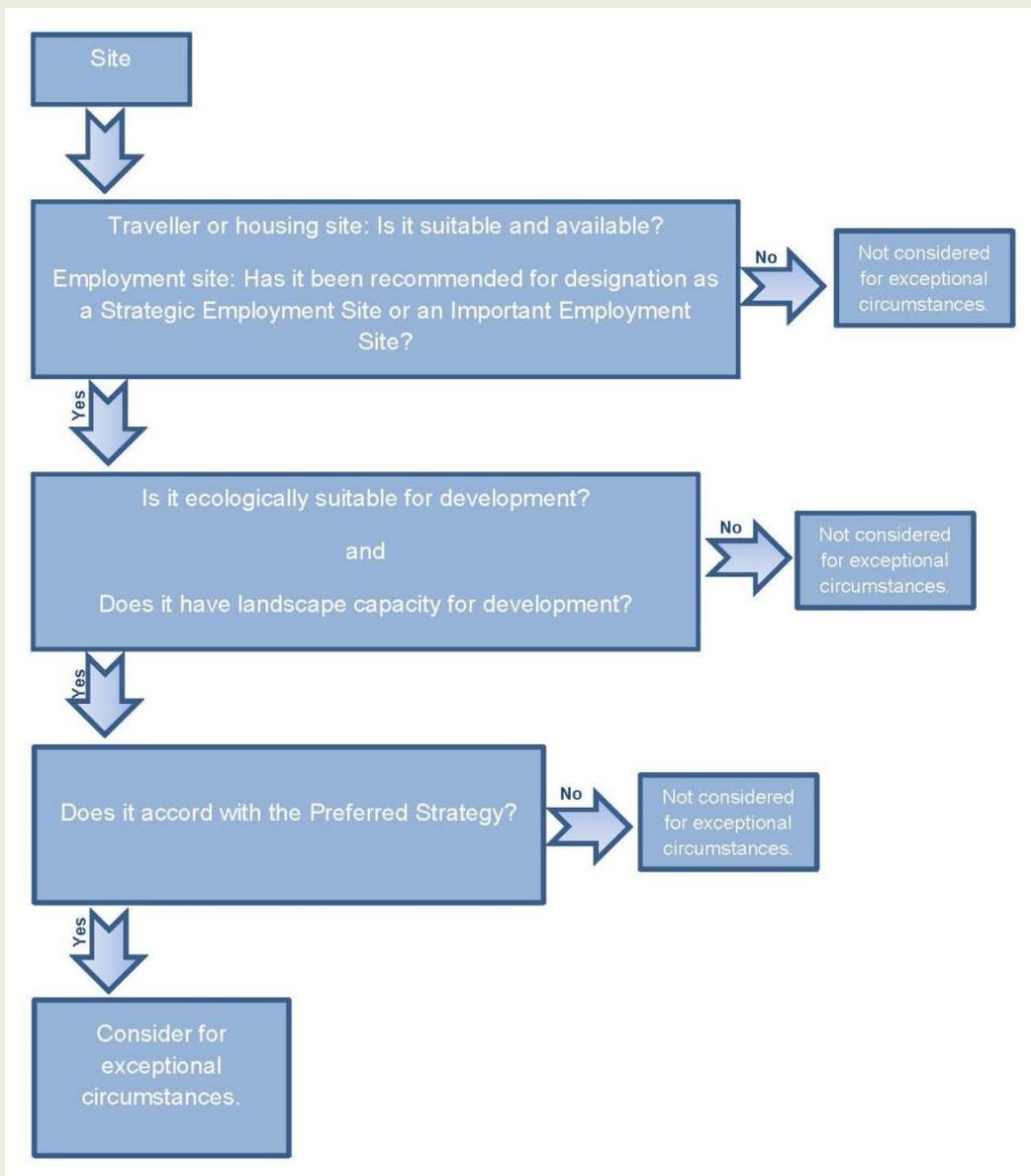
3.45. In order to ensure that a consistent approach to the assessment of exceptional circumstances a set of key questions is set out in the pro formas. The answers to which have then all been brought together and discussed, going through a balancing exercise in order to determine whether or not exceptional circumstances are present. The balancing exercise also takes into account the conclusions arising within this report in relation to strategic matters. The questions asked are set out below:

Is the site strategy compliant?
Does the Green Belt Assessment recommend that the Green Belt in this location should be retained or further considered in terms of exceptional circumstances?
What is the nature and extent of the harm to the Green Belt if the site is developed?
To what extent can the consequent impacts on the purposes of the Green Belt be ameliorated or reduced to the lowest reasonably practicable extent?
Does the ecology evidence consider the site is ecologically suitable?
Does the landscape evidence consider the site has capacity to accommodate development in the landscape?
Does the Open Space, Sport and Recreation Facilities Assessment consider

that the site is surplus provision or can facilities be re-provided elsewhere?
Does the Sustainability Appraisal consider that the site is a sustainable location?
Is the site sequentially preferred? Would development of the site increase flood risk or impact on water quality?
Is the proposed development of the site likely to result in harm that would be difficult to mitigate and/or provide opportunities for community benefit?

The Sites being Assessed

3.46. Arriving at which sites should be assessed for exceptional circumstances followed a number of sifting exercises at different stages of the Local Plan process. This has not necessarily included sites recommended for consideration in this Part 3 document, as not all the sites investigated in Part 2 have been identified through the HELAA as either suitable or available. The following flow chart shows the process through which sites have gone in order to determine which should be considered for exceptional circumstances.



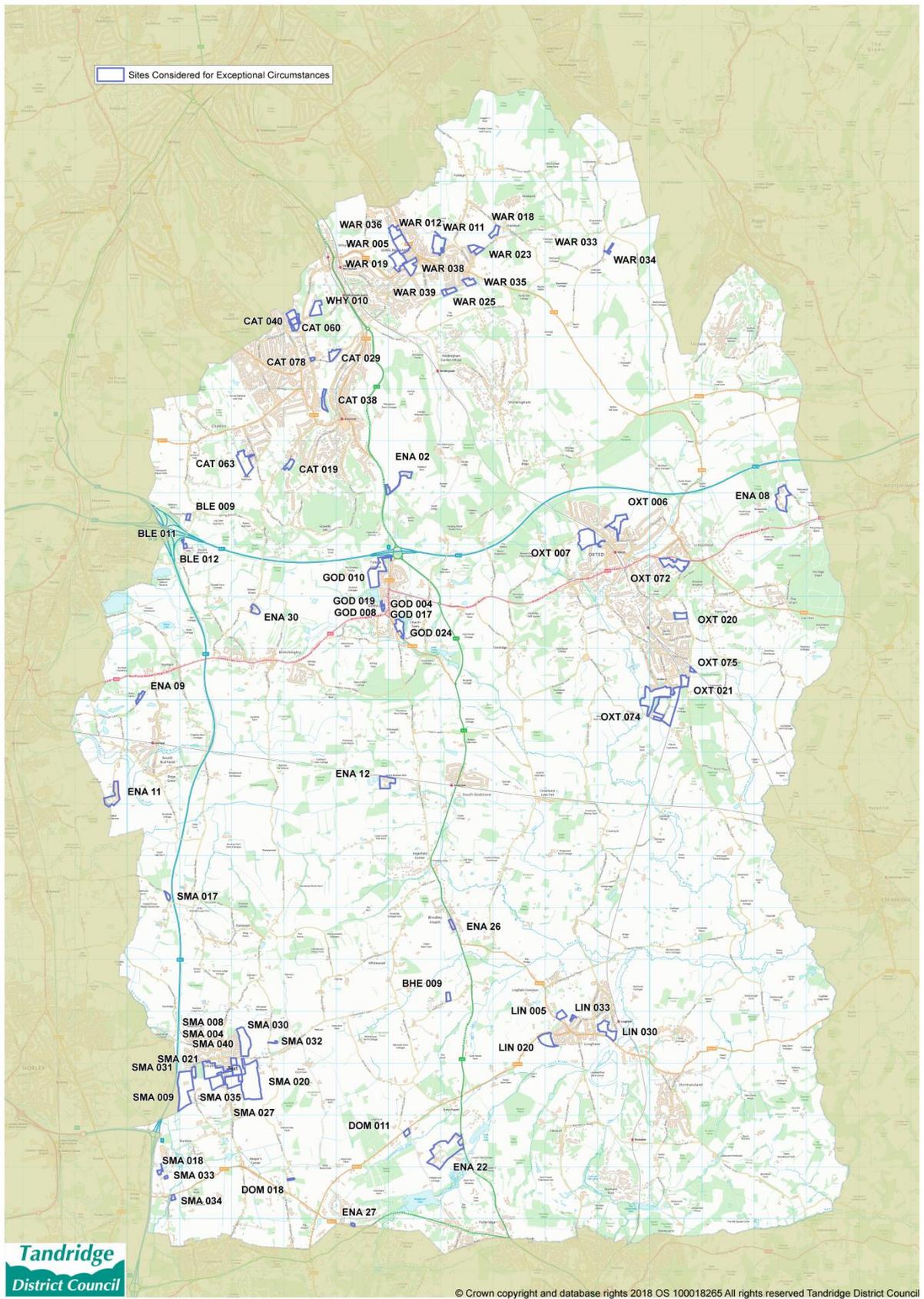
- 3.47.** The first step was to look at only those sites (housing, employment and Traveller) which have been found to have development potential within the most up-to-date Housing and Economic Land Availability Assessment (2017/18). The HELAA looks at sites identified from multiple sources and categorises whether or not they are suitable and available. A detailed assessment of this process can be found within the HELAA however the main points are listed below, particularly where they differ between the different types of sites.
- 3.48.** In arriving at a list of those housing sites which are suitable and available, the HELAA has excluded sites where constraints are present which are deemed to be a significant risk/barrier to the prospect and delivery of development e.g. Areas of Outstanding Natural Beauty. It also excludes sites which are not locationally suitable. For the purpose of the HELAA, sites were considered locationally unsuitable if they were remotely located or were within or adjacent to a Tier 4 settlement (a limited or unserved settlement) as set out in the Settlement Hierarchy (2015 and 2018 update).
- 3.49.** Its approach to determining the suitability and availability of Traveller sites differs in a couple of respects. Traveller sites that are not connected to an existing sustainable settlement are still considered suitable, in recognition that existing Traveller sites are often in relatively remote locations. Furthermore, if they are sited in an area designated as AONB it has been concluded that it does not automatically restrict development of sites for Traveller uses.
- 3.50.** The HELAA lists all employment sites, the majority of which have been assessed through the Economic Needs Assessment 2015 and its update in 2017. This categorised sites in relation to whether or not they should be designated as Strategic Employment Sites (SES), Important Employment Sites (IES) or otherwise are not recommended for any form specific policy response. Those sites which have gone through to the next stage are those recommended for designation as either SES or IES.
- 3.51.** The second step was to look at all suitable and available sites outside of the built up areas in relation to their impact on landscape and ecology. All sites were sifted in light of their performance in relation to the capacity of the landscape to accommodate development. Where it was concluded sites would have a negligible, negligible/low or low capacity to accommodate development these were not considered any further as a way of meeting development need. Sites were also considered in terms of their ecological sensitivity. The assessment highlighted sites where the presence of development would cause little disruption to local ecology/biodiversity or where development could still take place subject to appropriate mitigation measures and/or by avoiding sensitive parts of the site. Sites categorised as 'Unsuitable' or 'Unsuitable due to point of access issue' have not been considered any further as a way of meeting development need.

3.52. However, through the Sites Consultation process, which ran between November and December 2016, land promoters and/or land owners had the opportunity to refute the Council's conclusions and present their own evidence. Where this occurred, the Council has reviewed its conclusions to see if this has changed as a result; which means sites previously ruled out on these grounds could be re-categorised and thus could be considered as part of this assessment. The last step was to assess whether or not the remaining sites accorded with the Council's Preferred Strategy for achieving sustainable development³. In relation to housing sites, this means that only those sites within or adjacent⁴ to the Tier 1 and Tier 2 Settlements have been considered.

3.53. With regards to Traveller sites, the Preferred Strategy does not identify a preferred location for traveller development. Instead it is seeking to accommodate development needs on Green Belt sites where exceptional circumstances can be demonstrated and where it accords with national policy requirements; as such they have not been sifted in the manner identified above.

3.54. Finally, in terms of the employment site, the Preferred Strategy supports economic growth through intensification and/or expansion of existing employment sites, where appropriate; and by allocating additional employment land in sustainable locations to support the local and rural economy. The Economic Needs Assessment identifies that the district has enough land to meet the need through pursuing this policy approach however most of the sites are in the Green Belt and the majority are remotely located; accordingly the employment sites were not sifted along these lines. As a result 69 sites have been identified for which exceptional circumstances are being considered. This comprises 13 Traveller sites, 43 housing sites (including 4 sites – GOD 004, GOD 008, GOD 017 and GOD 019 which have been grouped together) and 10 employment sites. The sites which have been assessed are shown on the following map.

⁴ Sites are also considered adjacent where they are located next to a site which is itself adjacent to a Tier 1 or Tier 2 settlement.



4.1 Garden Community - Exceptional Circumstances and the Principle of Development

4.1. Following the two Regulation 18 Local Plan consultations and their subsequent Sustainability Appraisals, the Council identified through its Preferred Strategy that a sustainable approach to meeting its need would be through delivering a new/extended settlement in line with the Garden Village principles. In August 2017, the Council undertook a Regulation 18 Local Plan: Garden Village consultation. Accompanying this consultation was a Spatial Approaches Topic Paper (2017) and a broad location HELAA (2017). Both of these documents explain how the Council determined the four locations that were consulted on:

- Land west of Edenbridge
- Blindley Heath
- South Godstone
- Redhill Aerodrome

4.2. Following the consultation and concerns raised by Sevenoaks District Council (where half of the 'land west of Edenbridge' village would have been located) and concerns over the accessibility of this location, the Council no longer considered land west of Edenbridge as a location to explore further.

4.3. The Council has continued to gather evidence in order to determine where, based on a balance of the evidence, is the most appropriate location for the new/extended settlement. It is not the role of this document to determine or set out which is the preferred location; that is the role of the Local Plan.

4.4. However, as whichever location is chosen will be in the Green Belt due to the extent of Green Belt within this district (94%), it is necessary to understand the principle behind the exceptional circumstances. The Council is taking a 2-stage approach to this. The first stage, which will be undertaken here, is to set the principal for releasing Green Belt for this purpose, so it will set out the exceptional circumstances at a high level.

4.5. The second stage will be to determine the extent of the preferred location and its boundaries and this will be through a subsequent Area Action Plan (AAP). This will require detailed consideration after the adoption of Our Local Plan to ensure it accords with the requirements of paragraph 85 of the NPPF (2012) which states that:

When defining boundaries, local planning authorities should:

- ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development
- not include land which it is unnecessary to keep permanently open

- where necessary, identify in their plans areas of ‘safeguarded land’ between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period
- make clear that the safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of safeguarded land should only be granted following a Local Plan review which proposes the development
- satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period
- define boundaries clearly, using physical features that are readily recognisable and likely to be permanent

4.6. The Council therefore needs to ensure that no more land than is necessary is released to meet the need for housing and the associated facilities, services and infrastructure. Once the Council is confident that all the land proposed for release is required for the new/extended settlement, the boundaries are defined clearly and are likely to be permanent, will those boundaries be set through the AAP. It is not the intention of this paper to recommend the land which should be released through Our Local Plan or consider the prospect of safeguarding any land, as safeguarding also requires more detailed work to establish the extent of land needed and its boundaries. As such, further work on exceptional circumstances will be required at the second stage to support the AAP, but only in terms of the precise boundary; the broad location will have been set by Our Local Plan.

4.7. The approach to assessing the new Garden Community accords with the framework used for assessing the individual sites, albeit it cannot be at such a fine grained level; as such a more strategic approach has been undertaken.

4.8. As outlined in section 3 the Calverton principles (i) to (iii) have been used. In addition the reasonable alternatives have also been assessed, both within this paper and the Tandridge Local Plan 2013-2033: Regulation 19 Housing Topic Paper. The Regulation 19 paper has looked at the quantum of housing that could be secured within the district’s sustainable settlements (Tiers 1 and 2) and therefore the level of contribution to the OAN. It has also explored how much housing could be delivered on sites adjacent to Tier 1 and Tier 2 settlements, including the impact upon their sustainability and infrastructure, but also, given all those sites are in the Green Belt, how many of those sites have what the Council considers are the exceptional circumstances needed to justify their release. Given the extent of the OAN that could be met having taken all these factors into account, the Council considers that there would be a significant shortfall and that this represents a significant factor in the case for releasing land from the Green Belt to provide a new/extended settlement. Further issues around the district’s inherent constraints which restrict the quantum of development on the edge of sustainable settlements, as well as

issues around infrastructure, affordability, the provision of affordable housing, employment provision and an ageing population have been recognised throughout the preparation of the Plan.

Is it strategy compliant?

4.9. Whichever of the locations is chosen, it will be strategy compliant in that it will accord with the Preferred Strategy.

Does the Green Belt Assessment recommend that the Green Belt in this location should be retained or further considered in terms of exceptional circumstances?

4.10. For each of these areas it is recognised that the Green Belt serves one or more of the Green Belt purposes and beyond the built-up areas of South Godstone and Blindley Heath has served to keep the land predominantly open. For all these locations, the Green Belt has served to prevent sprawl from the built-up areas (purpose 1). Between South Godstone and Blindley Heath in particular it has contributed to ensuring that they do not merge (purpose 2). It has also, in all cases, served to safeguard the countryside from encroachment (purpose 3), however, they are not generally considered to serve purpose 4, due to the lack of any conservation areas in their locality.

What is the nature and extent of the harm to the Green Belt if the site is developed?

4.11. The development of any of these locations will result in development in the countryside contrary to purpose 3. It will lead to the expansion of a settlement in the case of South Godstone or Blindley Heath contrary to purpose 1 and it also has the potential to impact on the Green Belt's ability to serve purpose 2. The development of any of these locations would also clearly impact upon the openness of the Green Belt. Given the scale of development, the extent of its impact in whichever location is chosen will unarguably be significant in a local context. However, when set against the extent of Green Belt remaining in this district, as well as the wider functioning of the Metropolitan Green Belt, its overall impact can be seen in context.

To what extent can the consequent impacts on the purposes of the Green Belt be ameliorated or reduced to the lowest reasonably practicable extent?

4.12. Whichever location is chosen, work will be undertaken to ensure that the minimum amount of land is released. Moreover, the use of landscaping and regard for the landscape and topography to provide buffers to the Green Belt beyond will be important on minimising its impact and ensuring appropriate transitions between the new/expanded settlement and the land around it. Should either Blindley Heath or South Godstone be chosen, the careful siting of development will ensure they do not merge, or have the appearance of doing so. Finally, by securing robust and defensible boundaries, selected for their

permanence, it is considered it would not harm the wider Green Belt's ability to continue to serve the Green Belt purposes.

Does the ecology evidence consider the locations for a new/extended settlement to be ecologically suitable?

4.13. Redhill Aerodrome is Ecologically Suitable, being of relatively low ecological interest but with potential to restore natural environmental interest around undevelopable areas along the Redhill Brook and Salfords Stream. South Godstone is considered to be Majority Ecologically Suitable, being mostly of relatively low ecological value but with pockets of locally important and ancient woodland, requiring buffering and protection, and some constraints on access and drainage infrastructure. Similarly Blindley Heath is also Majority Ecologically Suitable but around retained woodlands and in more closely-networked hedgerows, sensitive design of roads and residential parcels would be required. Undevelopable areas around Ray Brook are of low ecological interest but offer the opportunity to restore natural environmental interests.

Does the landscape evidence consider the locations for a new/extended settlement have capacity to accommodate development in the landscape?

4.14. The landscape evidence notes Redhill Aerodrome's open character and its relatively level topography, concluding that it has potential to accommodate a new settlement. In relation to South Godstone, it notes that land to the south of the railway line is well contained within the landscape, by high ground to the south, the wooded railway line, and the treed Tandridge Lane, with raised land to the east providing a robust edge. Land to the north is described as open, exposed and forming the setting of the village. Finally, in relation to Blindley Heath, the landscape appraisal identifies robust features which would form the basis of a new settlement boundary in the high ground to the north and north-west, together with substantial blocks of woodland on the south facing slopes and roads and woodland blocks to the west.

Does the Open Space, Sport and Recreation Facilities Assessment consider that the site is surplus provision or can facilities be re-provided elsewhere?

4.15. Whichever location is chosen, it is unlikely to result in the loss of existing provision, however, it is recognised that the increased population will mean that additional facilities will be necessary and these will be carefully planned as part to the new settlement. It also provides the opportunity to support the wider district and provide facilities which can be used by settlements elsewhere in the district. The Council is working with Sport England to ensure the provision, both here and elsewhere within the district, is satisfactory and meets the residents' needs.

Does the Sustainability Appraisal consider that this is a sustainable location?

4.16. Inherent to all three of these locations is the fact that as they currently stand they are not considered to be sustainable, however, a key focus for the Council will be ensuring that whichever is chosen will become sustainable as a result and the Council has been and will continue to work with infrastructure providers to ensure the right infrastructure is brought forward and is integral to the new/extended settlement. It will also have beneficial impacts in relation to nearby settlements.

Is the site sequentially preferred? Would development of the site increase flood risk or impact on water quality?

4.17. Each location has been assessed through the Strategic Flood Risk Assessment 2018. This has looked at all sources of flooding for each location but it has also identified what measures can be undertaken to ensure that development is safe from flooding and does not increase the risk of flooding elsewhere. It is noted that each of the locations has issues around flooding of different extents, but that the majority for all three is within Flood Zone 1, which has the lowest risk of flooding. As such the Council will ensure that a sequential approach is taken to ensure that development is located in the areas of lowest flood risk and that, where necessary, development will only go in higher flood risk zones where it has passed the Exception Test, where applicable. The SFRA highlights the need to apply the Sequential and Exception Tests, and the need to include Sustainable Drainage Systems (SuDs). However it also indicates that in areas of high flood risk (the functional floodplains), benefits can be secured and these can be incorporated through master planning as outdoor recreation areas, forming part of the Green and Blue Infrastructure.

Is the proposed development of the location likely to result in harm that would be difficult to mitigate and/or provide opportunities for community benefit?

4.18. Each of the locations has its own challenges, but the Council has explored how these challenges can be addressed and where necessary, mitigated.

The following benefits of delivering a new or extended settlement have been identified as necessary, viable and deliverable.

- Provision of employment space (offices, start up space and retail).
- Provision of new school provision (primary and secondary).
- Integrated Neighbourhood Centres providing space for new health hub facilities and community space e.g. community centre, parish hall and/or place for multi-faith religious congregations.
- Improvements to the highway.
- Upgrades to railway station, with increase in service frequency and capacity to be sought, where applicable.

- Provision of a transport hub.
- Properties and facilities to be designed to zero carbon standards.
- Opportunity to integrate renewable energy technologies and community energy facilities.
- Incorporation of Green Infrastructure, addressing existing access deficiencies.
- Improvement and enhancement of biodiversity and habitat connectivity.
- Inclusion of walking and cycle routes to support residents' well-being.
- Play and open spaces, with recreational spaces, sports pitches, play spaces and other typologies provided to support the health and well-being of residents.

Discussion: Are there exceptional circumstances that would outweigh the harm to the Green Belt and justify Green Belt release?

4.19. Having considered (i) the acuteness/intensity of the objectively assessed need for housing, (ii) the inherent constraints on supply/availability of land prima facie suitable for sustainable development and (iii) the consequent difficulties in achieving sustainable development without impinging on the Green Belt (Calverton principles (i) to (iii)), as well as the reasonable options set out in the draft NPPF 2018, it is evident that development within the Green Belt is necessary. It is also evident that only a relatively small amount can be provided on sites around existing Tier 1 and Tier 2 settlements.

4.20. In light of the above, housing development on any of these locations would make a substantial contribution of up to 4000 units which would help meet the district's acute housing need in the long- term, and furthermore, by ensuring the new/extended settlement is sustainable, i.e. it will be supported by the facilities and services needed, e.g. doctors surgery, schools, employment and improved public transport provision, it would be consistent with the principles of sustainable development and in accordance with the Council's Preferred Strategy.

4.21. For each of these areas it is recognised that the wider Green Belt serves one or more of the Green Belt purposes. Beyond the built-up areas of South Godstone and Blindley Heath the Green Belt has served to keep the land predominantly open. For all these locations, the Green Belt has served to prevent sprawl from the built-up areas and safeguarded countryside from encroachment, whilst between South Godstone and Blindley Heath it has contributed to ensuring that they do not merge (purpose 2). Therefore, due to the amount of land involved the development of any of these areas would have a significant impact on the Green Belt's ability to serve its purposes. However, in the wider context of the extent of Green Belt in this particular district the impact would be limited overall and, subject to securing robust and defensible

boundaries, it would not impact on the wider Green Belt's ability to serve its purposes. The development of any of these locations would also clearly impact upon the openness of the Green Belt. However, by ensuring only the minimum amount of land is needed, including appropriate landscaping, buffers and using the topography to support the development, and by ensuring careful siting, particularly to ensure Blindley Heath and South Godstone do not merge, it is considered that the harm to the Green Belt can be minimised.

4.22. All three locations have been identified as having landscape capacity and as being ecologically suitable, subject to robust boundaries being identified.

4.23. Furthermore, the development of any of these locations would attract Community Infrastructure Levy, and as such would contribute towards infrastructure needed to support the growth of the district. In addition the infrastructure provision within each location could provide benefits wider than those required to service the development itself. The community benefits that the Council would require from any of these locations would include additional school provision, highway improvements, improved and expanded health provision, a transport hub, improved access to open space, green infrastructure, outdoor space and recreation facilities, a community hub and employment provision. The scale of provision is likely to change catchment for existing infrastructure and relieve pressure elsewhere. These sites also provide the opportunity to secure biodiversity enhancements, which would benefit the wider community.

4.24. This approach would allow the Council to draw up an infrastructure led plan that would be of benefit to both existing and future residents. It would also allow for high quality development, and would allow the Council to go some way towards addressing issues around affordability, affordable housing and addressing the needs of the district's ageing population..

Conclusion

4.25. Whilst there would be harm to the Green Belt whichever location is chosen, it is considered that the above factors, taken cumulatively, justifies exceptional circumstances. However, the Council recognises that bringing forward a new or extended settlement will require careful planning in order to ensure the right infrastructure is brought forward at the right time but also to ensure the right form of development and that only the minimum necessary is released, whilst being mindful of the need to ensure Green Belt boundaries are permanent.

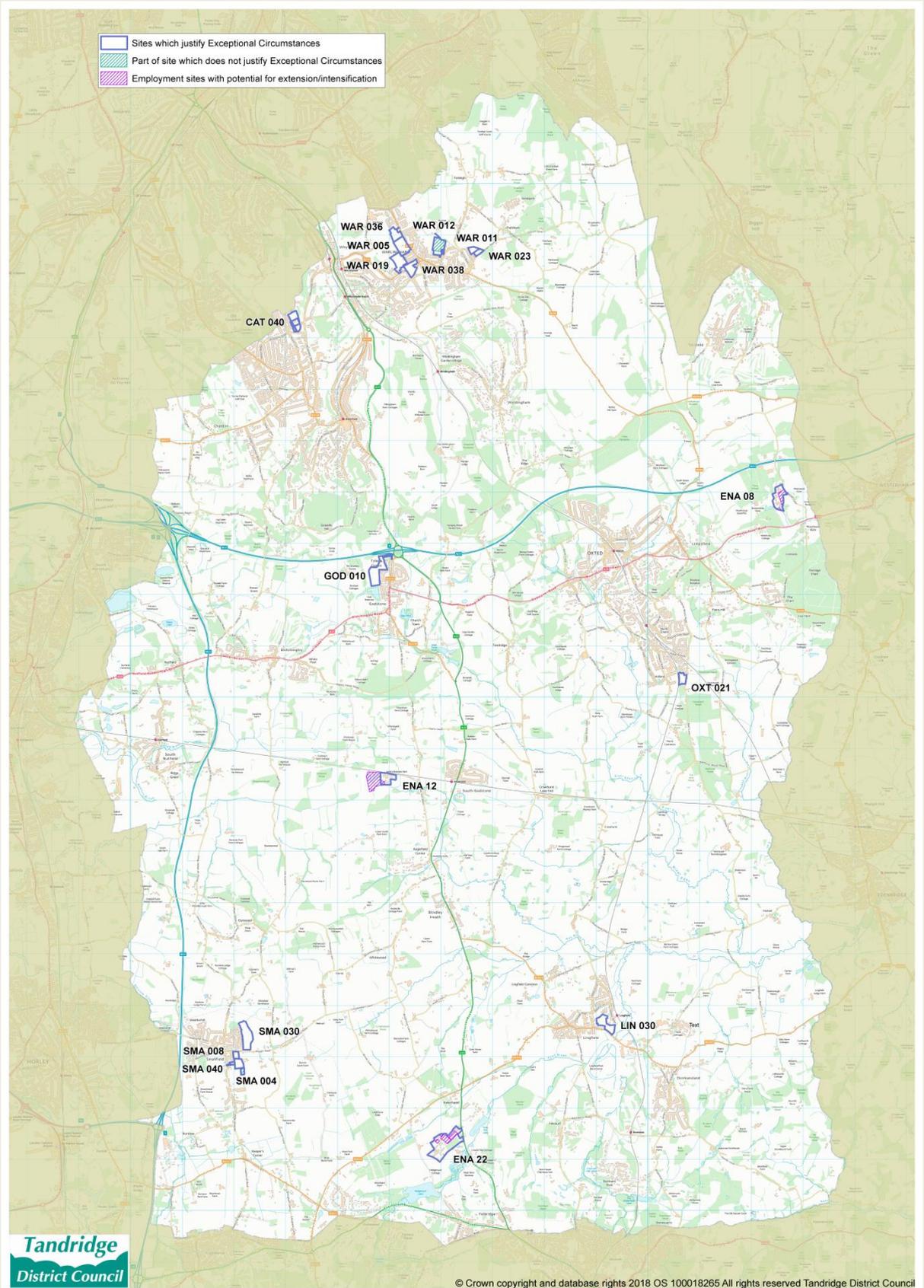
5.1 Findings

5.1. There are three different elements to this Green Belt Assessment Part 3. The first element considered in this paper was to look at the settlements recommended through Part 2 for consideration as to whether they should remain in the Green Belt or be inset. Part 2 identified whether these settlements had an open character and its contribution to openness and this part of the Assessment took the next step of considering the implications for inseting settlements in light of their sustainability. Of the 12 recommended through Part 2, only one, Godstone, is recommended through this Part 3 for inseting. It also recommends that South Godstone and/or Blindley Heath be considered for inseting but this is dependent on which of those settlements the Local Plan determines is the preferred location thereby ensuring whichever is the chosen location has acceptable levels of sustainability, which will accord with the Council's approach to inseting.

5.2. The second step within this Assessment has been the consideration of 69 sites (housing, employment and Traveller) in order to conclude whether or not they justify exceptional circumstances and thus recommend their release from the Green Belt. It has been concluded that at a strategic level, and in light of the work undertaken to establish the level of housing that could be secured in the district's built up areas, there is justification for the release of Green Belt land. This Assessment has considered each site having regard to the Calverton principles as well as locally derived considerations. It has concluded that there are 15 housing sites and 3 employments sites which justify exceptional circumstances and those sites are as follows:

Housing sites	
CAT 040	Land off Salmons Lane West, Caterham
GOD 010	Land to the west of Godstone
LIN 030	Land at the Old Cottage, Station Road, Lingfield
OXT 021	Land west of Red Lane, Hurst Green, Oxted
SMA 004	Land off Redehall Road, Smallfield
SMA 008	Land at Plough Road, Smallfield
SMA 030	Land north of Plough Road, Smallfield
SMA 040	51 Redehall Road, Smallfield
WAR 005	282 Limpsfield Road, Warlingham
WAR 011	Green Hill Lane, Warlingham
WAR 012	Land at Farleigh Road
WAR 019	Former Shelton Sports Club, Warlingham
WAR 023	Land at Alexandra Avenue, Warlingham
WAR 036	Land to the west of Limpsfield Road, Warlingham
WAR 038	Land west of The Green and land at Westhall Road
Employment sites	
ENA 08	Westerham Road Industrial Estate
ENA 12	Lambs Business Park
ENA 22	Hobbs Industrial Estate

Figure 5: Map providing an overview of all the sites considered to have exceptional circumstances



5.3. Finally, the Council's Preferred Strategy has already determined that it would include a new or extended settlement and it is for the Local Plan to determine based on the evidence gathered where that should be. This document's role

has been to look at whether there are exceptional circumstances to justify the release of Green Belt land to accommodate this approach. It is concluded that exceptional circumstances would exist for the broad locations under consideration by the Local Plan. However, the final boundaries are not being set at this stage as further work is required to ensure the minimum amount of Green Belt is released whilst allowing for a settlement which is fully sustainable. This work, including boundaries, will be secured through an Area Action Plan (AAP), which will follow the adoption of Our Local Plan.

6.1 Glossary

Acronym	Word	Definition
	Adoption	The final stage of implementation of the Local Plan; this requires the local planning authority to agree the Local Plan and make it publicly available.
	Affordable Housing	The Department for Communities and Local Government defines Affordable Homes as ' <i>social rented, affordable rented and intermediate housing, provided to specified eligible households whose needs are not met by the market.</i> '
	Ancient woodland	A woodland that has existed continuously since 1600 or before in England, Wales and Northern Ireland (or 1750 in Scotland). Ancient woodland is formally defined on maps by Natural England and equivalent bodies.
AAP	Area Action Plan	A Development Plan Document which provides a planning framework for a specific geographical area where change is anticipated. Area Action Plans focus on implementation and are a primary means of delivering planned growth areas.
AGLV	Area of Great Landscape Value	An area of land in England which is considered to have a particular scenic value, and is therefore afforded a degree of protection by local authorities.
AHAP	Area of High Archaeological Potential	In the Surrey Historic Environment Record (HER) maintained by Surrey County Council, there are a number of areas of high archaeological potential within the District. Within these areas there is good reason to expect some archaeological finds during any disturbance of the ground, such as during development. Applicants seeking planning permission within areas of high archaeological potential are required to undertake a prior assessment of the possible archaeological significance of the site and the implications for their proposals.
AONB	Area of Outstanding Natural Beauty	An area of countryside which has been nationally designated for conservation due to its significant landscape value and beauty.
BOA	Biodiversity Opportunity Area	Extensive areas where improved habitat management, as well as efforts to restore and re-create Priority Habitats will be most effective in enhancing connectivity to benefit recovery of Priority Species in a fragmented landscape.

Acronym	Word	Definition
	Broad Locations	The NPPF requires that local planning authorities should identify a supply of specific, developable sites or broad location for growth, for years 6-10 and, where possible for years 11-15. Broad locations therefore do not have set boundaries.
	Climate change	A change in global or regional climate patterns, in particular a change apparent from the mid to late 20th century onwards and attributed largely to the increased levels of atmospheric carbon dioxide produced by the use of fossil fuels.
CCG	Clinical Commissioning Group	Clinical Commissioning Groups are clinically led membership groups of GP practices that plan, commission and performance-manage a range of local health services for their population. CCGs were formed after the Health and Social Care Act 2012 was passed, devolving a range of commissioning responsibilities to CCGs from primary care trusts (PCTs).
CIL	Community Infrastructure Levy	A levy allowing local authorities to raise funds towards infrastructure from owners or developers of land undertaking new building projects in their area.
	Conservation Area	An area designated as being of special architectural or historic interest, the character or appearance of which it is desirable to preserve or enhance, designated by the local planning authority under the Listed Buildings and Conservation Areas Act 1990.
	Consultation	An opportunity for the public and stakeholders to make comments on any policies and content within the Local Plan, or what should be included in the Plan. All comments will then be taken into account when preparing each iteration of the Plan.
	Consultation Portal	The Council's consultation portal is called Objective and not only enables you to register for notifications and updates, it also puts you in charge of ensuring that we have your most up-to-date contact details and allows you to submit your comments online during active consultations, or to opt out of future notifications.
	Core Strategy	An old-style planning policy document which sets out key planning policies for the District. The latest Core Strategy for Tandridge will be superseded by the Local Plan.

Acronym	Word	Definition
DPD	Development Plan Document	Policy documents that are subject to formal procedures.
DtC	Duty to Cooperate	Introduced in the Localism Act (2011), the Duty to Cooperate is a legal test that requires cooperation between local planning authorities and other public bodies to ensure that Local Plans are created in a strategic way and cross boundary issues are recognised, and where possible, addressed. Cooperation must be constructive and take place on an ongoing basis.
ENA	Economic Needs Assessment	The ENA assesses the quantity, quality and viability of the District's employment land. It will inform the District's future approach to the provision, protection, release or enhancement of employment land and premises.
	Examination	Once consultation has been undertaken on the submission version of the plan, the local planning authority should submit the Local Plan and any proposed changes it considers along with supporting documents to the Planning Inspectorate for examination on behalf of the Secretary of State. The Inspector (on behalf of the Secretary of State) will investigate issues that have been raised through the consultation so that a solution / recommendation can be provided, where possible.
FRA	Flood Risk Assessment	An assessment of the risk of flooding from all flooding mechanisms, the identification of flood mitigation measures and advice on actions to be taken before and during a flood.
	Flood Risk Sequential Test	Local Plans should apply a sequential, risk-based approach to the location of development to avoid where possible flood risk to people and property and manage any residual risk, taking account of the impacts of climate change. One of the mechanisms to achieve this is to carry out a Flood Risk Sequential Test to support the Local Plan.
FE	Form Entry	Essentially for each Form of Entry there will be up to 30 children in a year group. So for a 2 Form Entry school there will be two classes accommodating up to 60 children for each year group.
GV	Garden Village	The Government's Garden Village Prospectus (June 2016) defines garden villages as new discrete settlements that are local authority led and capable of accommodating between 1,500 and 10,000 homes.

Acronym	Word	Definition
	Gatwick Safeguarding Zone	To keep the operation of the airport safe and secure, Gatwick is legally obliged to have an active policy of aerodrome safeguarding. This is managed by the airport's aerodrome safeguarding team which is responsible for making sure that no developments within the 15km safeguarding zone (30km for wind turbines) have an adverse effect on the airport's operation. See www.gatwickairport.com/business/16/16/business-with-us/aerodrome-safeguarding for more information.
GIS	Geographic Information System	A computer-based system whereby mapping and information are linked for a variety of uses, such as capturing data justifying Local Development Documents.
	Green and Blue Infrastructure	A living network of green spaces, water and other environmental features in both urban and rural areas. It is often used in an urban context to cover benefits provided by trees, parks, gardens, road verges, allotments, cemeteries, woodlands, rivers and wetlands.
	Green Belt	The Green Belt is a statutory designation that has the fundamental aim of preventing urban sprawl by keeping land permanently open. The NPPF states that the essential characteristic of the Green Belt is its openness and permanence. The Green Belt does not only constitute green spaces, but can also include roads, settlements and other built forms, such as industrial units.
	Green Belt Assessment	An assessment of the Green Belt to determine the strategic role of the Green Belt in the District, whether the Green Belt fulfils its purpose as set out in the National Planning Policy Framework and the role the settlements in the Green Belt play.
HRA	Habitats Regulations Assessment	A step-by-step process which helps to identify any likely significant effects and (where appropriate) assess the adverse impacts on a site that is protected by European legislation.
	Heritage Assets	A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions because of its heritage interest. Heritage asset includes designated heritage assets and assets identified by the local planning authority (including local listing).
HE	Highways England	Highways England is the highway authority responsible for trunk roads and motorways (the strategic road network).

Acronym	Word	Definition
HELAA	Housing and Economic Land Availability Assessment	The HELAA is a technical study which is used to assist in the monitoring of whether there is an adequate supply of deliverable housing land. It informs planning process in terms of identifying land that is suitable, available and achievable for housing and economic development uses over the Plan period. It identifies sites and broad locations with potential for development, assesses their development potential and assesses their suitability for development and the likelihood of that development coming forward.
	Impact Risk Zone	Areas surrounding/nearby a designated SSSI, where potential changes could create significant damage.
IDP	Infrastructure Delivery Plan	The Infrastructure Delivery Plan (IDP) identifies the key infrastructure required to support development within the District over the plan period and how it will be delivered.
	Infrastructure	The basic physical and organisational structure and facilities (communication, transportation, and utilities) needed for the operation of society or enterprise.
	Land Value Capture	Granting planning permission can increase the value of land. The increase in value can be 'captured' by the authority granting permission to pay for public infrastructure improvements.
	Landscape Assessments	An assessment of the distinct patterns or consistent combination of elements which make up the landscape of an area.
	Listed Buildings	A building of special architectural or historic interest. Listed buildings are graded I, II* or II with grade I being the highest. Listing includes the interior as well as the exterior of the building, and any buildings or permanent structures (e.g. wells within its curtilage).
LDS	Local Development Scheme	The LDS sets out the programme for producing the Local Plan which is the statutory development plan document for the area. It sets out what development plan documents the Council is intending to produce and when, and at what stage the community can get involved in the process.
LNR	Local Nature Reserve	Non-statutory habitats of local significance designated by local authorities where protection and public understanding of nature conservation is encouraged.

Acronym	Word	Definition
	Local Plan	One document within the Local Development Plan. The Local Plan is a planning policy document prepared by the Local Planning Authority that guides development for 20 years. The Local Plan is subject to consultation and independent examination before the Local Planning Authority can adopt the document.
MUGA	Multi-Use Games Area	An enclosed area, using a synthetic grass or hard surface for playing sports, for example five-a-side football or netball.
NPPF	National Planning Policy Framework	A document that sets out the Government's planning policies for England and how these are expected to be applied. The Framework was published in March 2012.
	Natural Burial	The action or practice of burying an un-embalmed body is laid to rest in a biodegradable coffin.
	Neighbourhood Plans	A plan prepared by a Parish Council or Neighbourhood Forum for a particular neighbourhood area (made under the Planning and Compulsory Purchase Act 2004).
PDR	Permitted Development Rights	Permission to carry out certain limited forms of development without the need to make an application to a local planning authority, as granted under the terms of the Town and Country Planning (General Permitted Development) Order.
	Planning Inspector / Inspectorate	The Planning Inspectorate's work includes national infrastructure planning under the Planning Act 2008 process (as amended by the Localism Act 2011), processing planning and enforcement appeals and holding examinations into local plans and community infrastructure levy charging schedules.
PPG	Planning Practice Guidance	Guidance on best practice for implementing the Government's planning policies set out in the National Planning Policy Framework.
	Preferred Strategy	In March 2017, the Council agreed a Preferred Strategy to be pursued in preparing the Local Plan. Fundamental to that strategy is the identification and pursuit of a sustainable location which is capable of delivering a large-scale development which accords with the principles of a Garden Village.
PDL	Previously-Developed Land	Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure. This excludes:

Acronym	Word	Definition
		<ul style="list-style-type: none"> • land that is or has been occupied by agricultural or forestry buildings; • land that has been developed for minerals extraction or waste disposal by landfill purposes where provision for restoration has been made through development control procedures; • land in built-up areas such as private residential gardens, parks, recreation grounds and allotments; and • land that was previously-developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape in the process of time. <p>There is no presumption that land that is previously developed is necessarily suitable for housing development or that the whole of the curtilage should be developed.</p>
	Reasonable Alternatives	These are options for the development of a garden village that are appropriate in terms of the vision, objectives and geographical scope of the Local Plan. This is a requirement of the SEA Directive.
	Scheduled Monuments	Nationally-important monuments, usually archaeological remains, that enjoy greater protection against inappropriate development through the Ancient Monuments and Archaeological Areas Act 1979.
SDC	Sevenoaks District Council	The administrative area, in Kent County, that borders Tandridge District to the east.
SNCI	Site of Nature Conservation Importance	Locally important sites of nature conservation adopted by local authorities for planning purposes.
SSSI	Site of Special Scientific Interest	A site of national importance for nature conservation identified and protected by Natural England.
SAC	Special Areas of Conservation	Special Areas of Conservation (SACs) are strictly protected sites designated under the EC Habitats Directive. Article 3 of the Habitats Directive requires the establishment of a European network of important high-quality conservation sites that will make a significant contribution to conserving the 189 habitat types and 788 species identified in Annexes I and II of the Directive (as amended).

Acronym	Word	Definition
SPA	Special Protection Area	Areas which have been identified as being of international importance for the breeding, feeding, wintering or the migration of rare and vulnerable species of birds found within European Union countries. They are European designated sites, classified under the Birds Directive.
SCI	Statement of Community Involvement	The SCI sets out standards to be achieved by the local planning authority in relation to involving the community in the preparation, alteration and continuing review of the Development Plan and in developing the SCI control decisions. In respect of documents prepared under the Development Plan the local planning authority is required to produce a statement showing how it complies with the SCI.
SFRA	Strategic Flood Risk Assessment	A study that provides information on the probability of flooding from all sources, such as that from rivers, surface water, groundwater and sewers. The SFRA is used to ensure that, in allocating land or determining applications, development is located in areas at lowest risk of flooding.
SHMA	Strategic Housing Market Assessment (2015)	An assessment to define housing need, in terms of types of tenure, size and need, for the requirements in the future.
SWOT	SWOT Analysis	An assessment to evaluate the strengths, weaknesses, opportunities and threats of a given project.
SCC	Surrey County Council	The County Council administrative area within which Tandridge District falls. Surrey County Council (SCC) is the local highway authority for the area and is responsible for a number of other services, including education and social services.
SA	Sustainability Appraisal	The process of assessing the impacts of policies and proposals against social, environmental and economic objectives.
	Sustainable Development	Development that meets the needs of the present without compromising the ability of future generations to meet their own needs. There are three dimensions to sustainable development: economic, social and environmental.
SuDS	Sustainable Urban Drainage Systems	SuDS offer an alternative form of drainage in urban areas by mimicking natural drainage and filtration systems in order to prevent surface water flooding and pollutants reaching the water course.

Acronym	Word	Definition
	Technical Studies	A range of detailed evidence-based documents produced to support the Garden Villages Consultation and wider Local Plan development.
TPO	Tree Preservation Order	A Tree Preservation Order is an order made by a local planning authority in England to protect specific trees, groups of trees or woodlands in the interests of amenity.
	Viability	An individual development is said to be viable if, after taking account of all costs, it provides a competitive return to the developer and generates a land value sufficient to persuade the land owner to sell the land for the development proposed.

