

# **Proposed Residential Development**

## **Land at Chichele Road, Oxted**

### **Planning Statement**

CALA Homes (South Home Counties)

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## 1.0 Introduction

- 1.1 This Planning Statement (hereafter referred to as ‘Statement’) has been prepared by Lichfields on behalf of CALA Homes (South Home Counties) (‘the applicant’) in relation to the submission of an application for full planning permission for residential development of Land at Chichele Road, Oxted, RH8 (‘the site’).
- 1.2 The site, currently comprising a large field and adjacent ancient woodland, is located to the north of Oxted. It lies wholly within Oxted Parish, albeit adjacent to the boundary with Limpsfield Parish to the East.
- 1.3 The application seeks full planning permission for: *“Proposed residential development (Class C3) including affordable housing with associated access, car parking, soft landscaping and play provision.”*
- 1.4 The proposed scheme comprises 116 dwellings, including 40% affordable homes.
- 1.5 The purpose of this Statement is to assess the proposed development against the relevant national and local planning policies and guidance, having regard to other material planning considerations. It also provides the information required for the Affordable Housing Statement as required by the Council’s validation checklist.

## Application Documents

- 1.6 This Statement is supported by and inclusive of an Affordable Housing Statement, Housing Supply and Delivery Review and a Benefits Statement, as well as draft S106 Heads of Terms. It should also be read in conjunction with the suite of technical drawings and assessments which accompany the application. These are as follows:
- Application forms, certificates, and appropriate application fee
  - Covering Letter, prepared by Lichfields
  - Planning Application Summary, prepared by Lichfields
  - Statement of Community Involvement, prepared by CALA
  - Full set of plans and drawings, prepared by Cooper Baillie (and levels strategy prepared by Motion)
  - Design and Access Statement, prepared by Cooper Baillie
  - Transport Assessment, prepared by Motion
  - Travel Plan, prepared by Motion
  - Flood Risk and Drainage Assessment, prepared by Motion
  - Utilities Assessment, prepared by Utility Results
  - Heritage Assessment, prepared by Smith Jenkins
  - Landscaping Details, prepared by David Jarvis
  - Lighting Assessment, prepared by MLK Consultancy

- Noise Assessment, prepared by Suono
- Energy and Sustainability Assessment, prepared by AES
- Tree Survey and Arboriculture Assessment, prepared by ACD
- Air Quality Assessment, prepared by Phlorum
- Environmental Statement, including an assessment on Landscape and Views, and Ecology and Biodiversity, jointly prepared by Lichfields, David Jarvis and Ethos

## Structure of Statement

1.7 The remainder of this Statement is structured as follows:

- **Section 2** sets out the background to the application including a description of the application site and surrounding area and planning history;
- **Section 3** describes the proposed development;
- **Section 4** sets out the planning policy context;
- **Section 5** provides a summary review of the five-year housing land supply and housing delivery position;
- **Section 6** assesses the principle of development and sets out the Very Special Circumstances (VSC) for the proposed scheme;
- **Section 7** provides a detailed assessment of the proposed development against relevant policy and guidance;
- **Section 8** sets out a brief commentary on the likely necessary planning obligations and planning conditions; and
- **Section 9** provides a summary and conclusions.

## 2.0 Background

### The Applicant

- 2.1 CALA Homes is one of the country's leading residential developers and has over 40 years' experience building new homes. CALA is committed to providing exceptionally well designed and constructed new homes in which people aspire to live. This is consistently recognised by industry peers and was most recently highlighted by the Large Home Builder of the Year Award at the 2023 Homes for Scotland Awards, as well as collecting the inaugural prize for 'Development of the Year – Medium' for its Newington Residencies development in Edinburgh. CALA's commitment to delivering quality housing schemes has also been commended in previous years by its recognitions at the 'What House? Awards' including best luxury development, best apartment scheme and best interior design.
- 2.2 This recognition demonstrates the Group's ability and expertise in delivering vibrant new communities and excellent design in a range of housing schemes. In May 2023, the Group also announced the acquisition of Taylor Lane Timber Frame Ltd, one of the UK's leading timber frame construction specialists, an investment that will help to drive CALA's progress towards sustainability targets and support delivery of the Group's plans to build all new sites in timber frame – which have up to less embodied carbon than a typical masonry build – from 2023.

### The Site

#### Surrounding Area

- 2.3 The proposed development site is located within the main urban settlement of Oxted. The site lies approximately 450m to the north of the centre of Oxted (around 6 minutes' walk), to the northeast of Chichele Road and north of Bluehouse Lane. This is shown in Figure 2.1.
- 2.4 Oxted is one of the main service centres in the District (alongside Caterham Valley which lies c.6km northwest of Oxted). Its main developed area is contiguous with the settlements of Limpsfield, Hurst Green and Old Oxted, and the wider surroundings of the site comprise predominantly residential areas. A range of cafes, restaurants and commercial/retail uses are located around the train station and along Station Road East (including a large Morrisons supermarket and a Waitrose supermarket which is close to the site), and several schools (including St Mary's C of E Primary School and Oxted Secondary School) and medical services (Oxted Health Centre, pharmacies and several dental practices) are in close proximity to the site. A number of recreation and community uses can also be found within Oxted, including Tandridge Leisure Centre, Master Park, the Barn Theatre, Oxted Community Hall and Oxted Library.
- 2.5 The site benefits from a number of public transport services. Oxted train station lies within 600m walk of the site (c.7-8 minutes) and can be accessed on foot via either the proposed Chichele Road or Bluehouse Lane access points.

Figure 2.1 – Illustrative Site Location



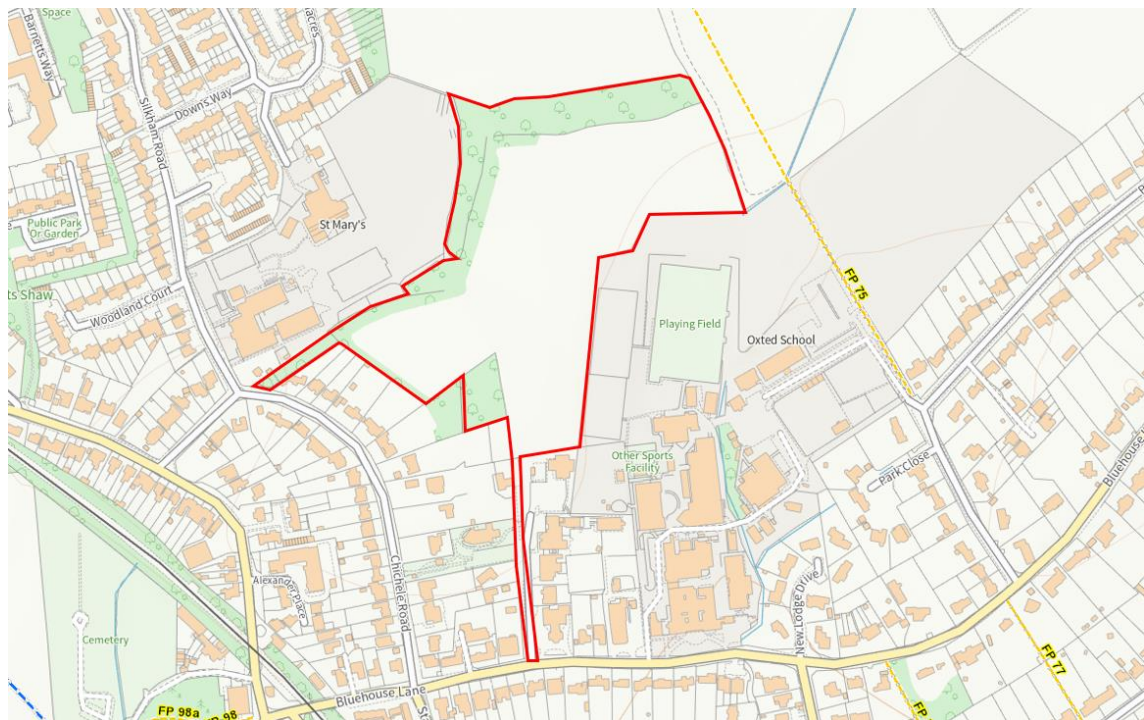
2.6 The site benefits from existing bus services on Chichele Road and Bluehouse Lane. The closest bus stop is currently located at the proposed site access on Chichele Road, but is to be removed to enable the access to be formed, with the existing bus stop 60m away outside St Mary’s School to be retained and continuing to operate. These stops serve routes 594 and 595, which provide frequent connections throughout Oxted and to Westerham. The Bluehouse Lane bus stops – also within very short and easy walking distance (less than 5 minutes) for all properties – serve routes 410, 609 and 611 which provide further connections to Redhill, South Godstone, East Grinstead, Reigate and Caterham.



## Application Site

- 2.7 The application site itself comprises an irregularly shaped agricultural field and deciduous woodland to the north, totalling approximately 6.36ha. As shown in Figure 2.1, the site is bounded by the rear of existing residential properties on Chichele Road to the southeast. The grounds of St Mary’s C of E Primary School lie to the northwest, and the grounds of Oxted Secondary School lie to the southeast – with playing pitches/sports facilities for both forming the immediate uses bordering the site, separated by existing hedgerows and pockets of woodland. To the north and northeast of the site are fields in agricultural use.
- 2.8 Access to the site is via a strip of land adjacent St Mary’s School which leads to Chichele Road, alongside pedestrian access that is also possible via Bluehouse Lane. There are no Public Rights of Way (PRoW) within the site; an order proposing several PRoWs around the edge the site (ref. ROW/3225371) was not confirmed by the Planning Inspectorate in May 2021. From that, it is understood that at points in the past informal footpaths have been used by the public to access the site and beyond to PRoW Footpath 75 (ref. UK008/75/20) Greensland Way which lies to the east of the site and provides links from Oxted to the wider area, including north of the site into the Surrey Hills (see Figure 2.2).

Figure 2.2 – Public Rights of Way nearby the site



Source: Surrey County Council interactive map (© Crown copyright and database rights 2021 OS 100019613)

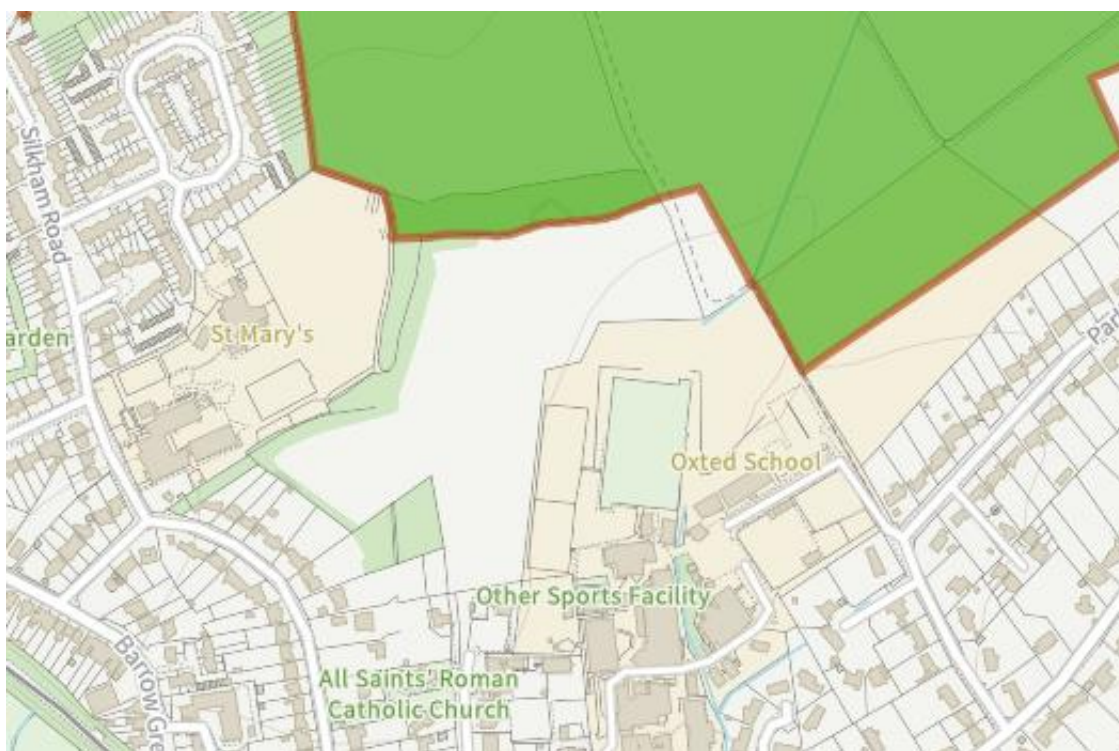
- 2.9 There are no listed buildings within the site. The nearest listed building is the Grade II listed Church of All Saints (ref. 1245423) located on Ward Lane, less than 100m from the southern corner of the site, followed by the Grade II listed United Reformed Church and Attached Walls (ref. 1388287) c.150m from the southern corner of the site – both of which are separated from the site by existing built development along Bluehouse Lane. There are no Scheduled Ancient Monuments in or around the site, and it is not located within a Conservation Area. The nearest Conservation Areas are located approximately 500m

southwest of the site, around the historic centre of Oxted and beyond the railway line, and Limpsfield (over 1km to the east).

2.10 Part of the woodland at the northwest border of the site is designated as Ancient Woodland (c.0.9 ha), from which any development must provide a 15m buffer. This woodland is also covered by a Tree Preservation Order (TPO) (refs. 7/2013/TAN and 7/2013/TAN) – and a further TPO (ref. 8/2013/TAN) is located around a singular oak tree to the southeast boundary of the site adjacent to Oxted School. The northern portion of this woodland (c.0.7 ha) within the site also lies within the Surrey Hills Area of Outstanding Natural Beauty (AONB) and an Area of Great Landscape Value (AGLV). The AONB boundary as it relates to the site is shown in Figure 2.3 below; this demonstrates that the main field forming the vast majority of the site falls outside the AONB and AGLV. A review of the AONB boundaries is being undertaken with a view to extending them, which may include the site, and this is addressed later in this Statement.

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Figure 2.3 – Surrey Hills AONB Boundary



Source: Tandridge District Council planning maps

2.11 In terms of other ecological and historic designations, the following are located within the surrounding area:

- Further Ancient Woodland (also covered by TPOs) is located approximately 300m north of the site, alongside Chalkpit Wood approximately 500m to the northwest of the site. These areas of woodland are also designated as Sites of Nature Conservation Importance within the adopted Development Plan (discussed further in Section 4).
- Woldingham & Oxted Downs Site of Special Scientific Interest (SSSI) is located approximately 1.2km northwest of the site, beyond the M25. It is over 128 hectares in

size and is designated for its biological interest including calcareous grassland and broadleaved, mixed and yew woodland.

- Titsey Place Registered Park and Garden (Grade II) is located around 1.2km northeast of the site, primarily north of the M25. It comprises large gardens surrounding a country house, set in parkland.
- Hill Park, Tatsfield Local Nature Reserve (LNR) lies over 3.5km to the northeast of the site. A rural LNR, it is designated for its semi-mature hardwoods, as well as presence of bird species and unusual wildflower species.

2.12 The site is located entirely within Flood Zone 1; the area with the lowest probability of flooding with less than 0.1% chance of flooding in any year. Small, limited areas of the site around the woodland boundaries have a low to high probability of flooding from surface water, but these are low risk in terms of depth and velocity, and there is no risk of flooding from reservoirs.

2.13 The site is not located within an Air Quality Management Area ('AQMA').

## Planning History

2.14 The most recent planning history relevant to the site relates to an Environmental Impact Assessment (EIA) Screening Opinion (ref. 2023/714/EIA) submitted in May 2023. The decision, issued in July 2023, concludes that residential development of approximately 125 dwellings would require an EIA due to *'the high sensitivity of part of the site and the potential for the development to have a significant environmental impact'*. The reasons for this conclusion relate to biodiversity and landscape/visual effects, with no other likely significant effects identified for other topic areas. This application is subsequent to a previous application for a Screening Opinion (ref. 2013/154/EIA) which adopted the same conclusion. On August 23 2023, the applicant lodged a request for an EIA Screening Direction from the Secretary of State which remains pending; notwithstanding this, an Environmental Statement is submitted with this application.

2.15 The only other planning history since 2000 consists of a withdrawn application (ref. 2006/735) for a single storey building in connection with borehole headworks, from which an access road would be taken from Chichele Road and through the site.

## Consultation on the Application Proposals

2.16 The applicant has undertaken engagement and consultation with both TDC Officers and the wider community to discuss the proposed development at the site.

2.17 A pre-application request (reference PA/2022/282) for proposed residential development of up to 125 homes at the site was submitted to TDC by the applicant in Q4 2022. A formal pre-application response was issued by TDC on 24<sup>th</sup> July 2023. The response sets out that, as a result of the whole site falling within the Green Belt, the development would, by definition (NPPF Paragraph 147), represent inappropriate development whereby *'no very special circumstances have been adduced that override the harm to the Green Belt and other harm arising from the development'*. The 'other harm' stated to be likely to arise from development is a failure to safeguard the countryside from encroachment, alongside the impact of the proposed residential development on the setting of the AONB and to the

adjoining Ancient Woodland. The response also identified that insufficient information had been provided to determine the acceptability of the proposed development on a range of other relevant planning considerations, such as the character and appearance of the proposed development, residential amenity, and highway safety and other highway impacts.

- 2.18 The issues and potential impacts raised within the pre-application response have been considered and directly addressed both within this Statement and relevant technical assessments accompanying the application. This is set out in further detail within Section 5, which provides a comprehensive assessment of the proposed development having regard to the key policy issues in the NPPF, Development Plan and other material considerations.
- 2.19 In addition, a public exhibition was held at the Oxted United Reformed Church on 12<sup>th</sup> July 2023 to seek the community's views on the proposed development. This followed a leaflet advertising the exhibition which was delivered to 851 homes in the wider area surrounding the site. The exhibition was welcomed by residents and the feedback from the event has helped to shape the design development of the final scheme, and is set out in the accompanying Statement of Community Involvement (SCI). The Statement confirms that the key issues raised by members of the public focused on the capacity of local infrastructure, including healthcare, schools, and highways. Other responses received during and/or after the event referred to the Green Belt status of the site and its proximity to the AONB, the importance of the Ancient Woodland and existing flood risk concerns. However, many residents also recognised that there is a lack of housing development in the local area, combined with the limited availability and unaffordability of existing homes.
- 2.20 As a result of this engagement, the SCI also sets out how comments have been taken into account within the proposed development. For instance, substantial interest was raised in relation to sustainable and low-carbon homes as part of the development, and the detailed design has subsequently adopted a number of measures in this regard such as air source heat pumps (ASHP), timber frame construction and solar photovoltaic (PV) panels. Specific, more technical issues raised – such as potential traffic congestion – have also been fully considered and addressed within the relevant assessments submitted with this application.

## 3.0 Proposed Development

- 3.1 This is an application for full planning permission for 116 new homes, comprising 70 market homes and 46 affordable homes (40% affordable housing provision), alongside associated landscaping, open space, parking, and infrastructure.
- 3.2 The proposed housing mix of the scheme comprises a wide range of different house types, from smaller one and two-bedroom apartments to larger detached four and five-bedroom houses. As shown in Table 3.1, the overall mix of the scheme, including market and affordable, is 9% five bedroom homes (houses), 11% four bedroom homes (houses), 31% three bedroom homes (houses), 34% two bedroom homes (houses and apartments) and 15% one bedroom homes (apartments). Of the proposed market homes, there is also the potential to deliver two as custom-build plots to continue to help meet demand in the District for this tenure. The location of these plots is within the north west corner of the site (Plots 109 and 110) as identified on the accompanying 'Affordable Housing Plan' drawing. These homes would be able to be internally configured to the purchaser's layout specifications.
- 3.3 The heights of the proposed homes range from two storeys up to a maximum of three storeys.
- 3.4 Table 3.1 below also provides a summary of the overall affordable and market housing mix by size. The market mix is characterised by 28.5% two bedroom homes, 38.5% three bedroom homes, 18.5% four bedroom homes and 14.5% five bedroom homes. The affordable mix consists of 39% one bedroom homes, 41% two bedroom homes and 20% three bedroom homes. The scheme will therefore provide a range of larger detached and semi-detached family properties, as well as smaller homes for first-time buyers, movers, and young families – both within the open market and for affordable tenures.

Table 3.1 – Affordable and Market Housing Mix

| No. of Bedrooms | Market    |             | Affordable |             | Overall    |             |
|-----------------|-----------|-------------|------------|-------------|------------|-------------|
|                 | No.       | %           | No.        | %           | No.        | %           |
| 1 bed           | 0         | -           | 18         | 39%         | 18         | 15%         |
| 2 bed           | 20        | 28.5%       | 19         | 41%         | 39         | 34%         |
| 3 bed           | 27        | 38.5%       | 9          | 20%         | 36         | 31%         |
| 4 bed           | 13        | 18.5%       | 0          | -           | 13         | 11%         |
| 5 bed           | 10        | 14.5%       | 0          | -           | 10         | 9%          |
| <b>Total</b>    | <b>70</b> | <b>100%</b> | <b>46</b>  | <b>100%</b> | <b>116</b> | <b>100%</b> |

Source: Lichfields analysis

- 3.5 The site will also deliver around 1.2 ha of public open space (POS) and significant landscaping buffers around its boundary. This includes the provision of a large, equipped play area in the west of the site which incorporates established trees and provides valued recreational space for children, alongside a smaller play area to the eastern boundary (totalling 390 sqm play provision). It also includes additional planting along the boundary to minimise views into the site as well as amenity green space both around the vehicular site entrance and the pedestrian route from Bluehouse Lane, complementing existing green infrastructure, incorporating sustainable drainage, and improving local access to open space. The Ancient Woodland included within the site boundary will remain undisturbed by

the proposed scheme, and a significant buffer to residential development is provided to protect and encourage biodiversity and complement the setting of the AONB and Ancient Woodland.

- 3.6 Primary vehicular access to the residential development is proposed from a widened access point onto Chichele Road to the west of the site. The internal layout is organised around a new internal primary spine road with lower order roads connecting from it. Pedestrian and cycle access points are proposed around the site, including from Bluehouse Lane to the south, to maximise sustainable connections and permeability.
- 3.7 The proposed scheme also comprises of highly sustainable and low-carbon residential design. Each of the proposed houses (excluding apartments) are proposed to be constructed in timber frame, and all south-facing four and five-bedroom properties are proposed to include solar photovoltaic (PV) panels on their roofs with battery storage. All properties will also be gas-free, with houses to be heated via air-source heat pump and apartments through hot water heat pumps, will utilise local materials and will include electric vehicle charging points.
- 3.8 A full description and explanation of the proposed design and layout of the development is provided in the accompanying DAS, and a full set of application drawings provide further details of the proposed scheme. These demonstrate that the proposed scheme has been developed through careful and robust consideration of the range of constraints and opportunities present at the site, which have been subject to a series of surveys and other technical and non-technical assessments.

## 4.0 Planning Policy Context

4.1 This section of the Planning Statement details the policy context for the application, describing the Development Plan policies relevant to the consideration of the scheme, as well as providing an account of the prevailing policy guidance in the National Planning Policy Framework ('NPPF' or 'Framework') and other documents that represent appropriate material considerations. In doing so, it identifies the key planning considerations against which the planning application will be assessed in the following section.

### National Planning Policy

4.2 The NPPF (September 2023) sets out national planning policy and is a material consideration in determining planning applications. The NPPF requires Local Planning Authorities (LPAs) to adopt a positive approach to decision taking and to apply a presumption in favour of sustainable development. Key elements of the NPPF of most relevance to the site are set out below.

### Sustainable Development and Decision Making

4.3 The aim of the NPPF is to proactively deliver sustainable development to support the Government's housing and economic growth objectives and meet the needs of the country. Paragraph 8 sets out the three dimensions of sustainable development:

- 1 Economic: to *"help build a strong, responsive and competitive economy"*
- 2 Social: to *"support strong communities and ensuring that a sufficient number and range of homes to meet the needs of present and future generations"*
- 3 Environmental: to *"protect and enhance our natural, built and historic environment"*.

4.4 To achieve this, Paragraph 11 goes on to state that for decision-taking the application of a presumption in favour of sustainable development means:

*"...c) Approving development proposals that accord with an up-to-date development plan without delay; or*

*d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:*

- i The application of policies in [the NPPF] that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or*
- ii any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in [the NPPF] taken as a whole."*

4.5 Local planning authorities should approach decisions on proposed development in a positive and creative way, and work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area (para 38).

## Green Belt and Very Special Circumstances

- 4.6 The proposed development site is Green Belt. Section 13 of the NPPF addresses Protecting Green Belt land. Paragraph 138 sets out the five purposes of the Green Belt, which are as follows:
- a to check the unrestricted sprawl of large built-up areas;
  - b to prevent neighbouring towns merging into one another;
  - c to assist in safeguarding the countryside from encroachment;
  - d to preserve the setting and special character of historic towns; and
  - e to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.
- 4.7 In terms of proposals affecting the Green Belt, Paragraph 147 states that ‘*inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances*’ (‘VSC’). The NPPF goes on to state that VSC ‘*will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations*’. This is a test of planning judgement to be exercised by the decision taker, with adequate reasoning.
- 4.8 Paragraph 149 specifies that the construction of new buildings should be regarded as inappropriate in the Green Belt, with some exceptions (such as buildings for agriculture or outdoor sports facilities). The proposed development does not benefit from the exceptions.

## The Natural Environment and AONB

- 4.9 Chapter 15 of the Framework seeks to protect and enhance the natural environment, including – inter alia – valued landscapes, sites of biodiversity value, and the intrinsic character and beauty of the countryside. Paragraph 176 states:
- “Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty which have the highest status of protection in relation to these issues... The scale and extent of development within all these designated areas should be limited, while development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas” (Emphasis added).*

## Other NPPF Policies

- 4.10 The NPPF contains further policies of relevance to considering this planning application. These include, but are not limited to:
- 1 Housing delivery (Chapter 5) and the critical importance of delivering homes to meet housing needs and to maintain a five-year supply of housing against housing requirements.
  - 2 Healthy communities (Chapter 8) and the importance of achieving healthy, inclusive, and safe places, which enable healthy lifestyles (for example providing green and open spaces close to neighbourhoods).



- 3 Sustainable transport (Chapter 9) and the objective of focusing development in locations which are, or can be made, sustainable, through limiting the need to travel and offering a choice of sustainable transport modes (e.g. walking, cycling and public transport use).
- 4 Good design (Chapter 12) and ensuring that developments are high quality, visually attractive, sympathetic to the surrounding area, optimise the potential of sites and create safe and inclusive places.

### **National Planning Practice Guidance**

- 4.11 The National Planning Practice Guidance (PPG) was initially published in March 2014 and provides detailed guidance on how to apply the policies contained within the NPPF, with reference to relevant legislation and other guidance. Through the publication of the (since updated) 2021 NPPF, the Government updated its PPG. Whilst the PPG only constitutes guidance, it is of relevance to the determination of the application and due regard has been made to it.

### **The Statutory Development Plan**

- 4.12 Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that regard is to be had to the Development Plan for the purpose of any determination to be made under the Planning Acts, and that the determination should be made in accordance with the Development Plan unless material considerations indicate otherwise.
- 4.13 The Statutory Development Plan for TDC currently consists of the Core Strategy adopted in October 2008, the Local Plan part 2 (Detailed Policies) adopted in July 2014 and the documents of the Surrey Minerals and Waste Development Framework. The Core Strategy sets out both a vision and a set of key policies for growth in the District in the period up to 2026, while the detailed policies within the Local Plan Part 2 support the implementation of the Core Strategy.
- 4.14 Given the current position with the emerging Local Plan examination – discussed next in this section – policies in the adopted development plan will apply to the application. However, it is necessary to be mindful of paragraph 11c of the NPPF and the need for decision-taking to approve development proposals that accord with ‘an up-to-date’ development plan without delay. In this context, the Core Strategy pre-dates the introduction of the NPPF and in many respects is inconsistent with the policies and objectives of the NPPF, not least in respect of its housing requirement contained at Policy CSP2 (125 homes per annum). The Tandridge Local Plan Part 2: Detailed Policies post-dates the NPPF, but was adopted pursuant to the growth strategy of the earlier Core Strategy, which only covers the period to 2026.
- 4.15 As a consequence of the inconsistency of some policies with the NPPF, the Council’s poor 5YHLS position and the Housing Delivery Test results (see Section 5 below), it is considered that the policies most important for determining this application are out of date. As a result, and in line with NPPF Paragraph 11d, the presumption in favour of sustainable development applies. We summarise the policy and designations which are directly and most relevant to the proposed scheme and affect the site and its immediate surroundings in the table below.

Table 4.1 – Relevant Policy and Designations

| Policy                           | Matter   | Summary of relevant policy requirements as they relate to the site   |
|----------------------------------|--|--|
| <b>TLP Part 1: Core Strategy</b> |  |  |
| CSP 1                            | Location of Development                              | <ul style="list-style-type: none"> <li>Identifies 'Category 1 Settlements' where most new development will take place, comprising Caterham, <u>Oxted</u>, Warlingham and Whyteleafe. These areas are also referred to as 'the built-up areas'.</li> </ul>  |
| CSP 4                            | Affordable Housing                                   | <ul style="list-style-type: none"> <li>Requires up to 34% of new dwellings to be affordable.</li> <li>Affordable housing may be social rented and/or intermediate and the exact mix will be agreed with the Council having regard to current local needs.</li> </ul>   |
| CSP 7                            | Housing Balance                                      | <ul style="list-style-type: none"> <li>Contain an appropriate mix of dwelling sizes in accordance with current identified needs as set out in future Housing Need Surveys and SHMAs.</li> </ul>  |
| CSP 11                           | Infrastructure and Services                          | <ul style="list-style-type: none"> <li>Make contributions towards improved infrastructure and services necessary to support the proposed development.</li> </ul>   |
| CSP 12                           | Managing Travel Demand                               | <ul style="list-style-type: none"> <li>Where appropriate, make improvements to the infrastructure network, including road and rail, facilities for bus users, pedestrians, and cyclists.</li> <li>Have regard to adopted highway design standards and parking standards.</li> </ul>  |
| CSP 13                           | Community, Sport, and Recreation Facilities/Services | <ul style="list-style-type: none"> <li>Residential developments may be required to include public open space to meet the needs of residents and/or contribute to their enhancement.</li> <li>A quantity standard of 1.27ha per 1,000 people for the provision of playing space will be applied.</li> <li>Protect and encourage improvements to the Rights of Way network.</li> </ul>   |
| CSP 14                           | Sustainable Construction                             | <ul style="list-style-type: none"> <li>Reach a minimum percentage saving in CO2 emissions through the incorporation of on-site renewable energy. For sites over 10 units, a 20% saving is required.</li> </ul>   |
| CSP 15                           | Environmental Quality                                | <ul style="list-style-type: none"> <li>Design and layout should be safe and secure and where possible meet "Secured by Design" Standards.</li> <li>Include Sustainable Drainage Systems where necessary.</li> <li>Encourages new homes to include "Lifetime Homes" principles.</li> <li>Encourages development to make provision for grey water recycling and/or the separate disposal of surface and foul water to adoptable standards.</li> <li>Encourages new development to include the technical resources to allow for the installation of information/communication technology.</li> </ul>  |
| CSP 17                           | Biodiversity   | <ul style="list-style-type: none"> <li>Protect biodiversity and provide for the maintenance, enhancement, and restoration of biodiversity, aiming to support ecological networks in accordance with the aims of the Surrey Biodiversity Action Plan.</li> </ul>  |
| CSP 18                           | Character & Design                                   | <ul style="list-style-type: none"> <li>Requires new development within built up areas to be of a high design standard that reflects and respects character, setting and local context.</li> <li>Have regard to the topography of the site and other important features that need to be retained.</li> <li>Not adversely affect the amenity of existing residents in terms of overlooking, overshadowing, visual intrusion, noise, and traffic.</li> </ul>  |
| CSP 19                           | Density  | <ul style="list-style-type: none"> <li>In the built-up areas, density of new development should be within the range of 30-55 dwellings per hectare unless this would conflict with the local character and distinctiveness of an area.</li> </ul>  |
| CSP 20                           | AONB   | <ul style="list-style-type: none"> <li>Sets a number of principles including to: conserve and enhance the special landscape character, heritage, distinctiveness and sense of place; conserve and enhance important viewpoints, protect the setting and safeguard views out of and into the AONB; support suitable located sustainable development necessary to facilitate the environmental, economic and social wellbeing of AONBs and their communities; promote access to recreation within and enjoyment of the area; and apply the highest environmental design standards to development.</li> <li>Applies the same principles to AGLVs as a buffer to the Surrey Hills AONB.</li> </ul> |
| CSP 21                           | Landscape and Countryside                            | <ul style="list-style-type: none"> <li>Requires new development to conserve and enhance landscape character.</li> </ul>  |

| Policy                               | Matter   | Summary of relevant policy requirements as they relate to the site  |
|--------------------------------------|--|---|
| <b>TLP Part 2: Detailed Policies</b> |  |   |
| DP1                                  | Sustainable Development                                      | <ul style="list-style-type: none"> <li>Reflects the presumption in favour of sustainable development and states that the Council will work proactively with applicants to secure development that improves the economic, social, and environmental conditions in the area.</li> </ul>   |
| DP5                                  | Highway Safety & Design                                      | <ul style="list-style-type: none"> <li>Comply with the relevant Highway Authority's design guidance.</li> <li>Demonstrate the development can be served by existing transport infrastructure and services without detriment to their operation.</li> <li>Retain or enhance existing footpaths and cycleway links.</li> <li>Provide safe, inclusive, and suitable access to the site and promote sustainable modes of travel to nearby areas.</li> <li>Contribute towards the costs of any necessary mitigation measures.</li> </ul>   |
| DP7                                  | General Policy for New Development                           | <ul style="list-style-type: none"> <li>Respect and contribute to the distinctive character, appearance and amenity of the local area, maximising opportunities to link the development with the surrounding area and local services.</li> <li>Reflect local building types in terms of materials and design.</li> <li>Be of an acceptable scale, form, bulk, height, spacing, density and design.</li> <li>Have regard to the adopted Parking Standards SPD (2012).</li> <li>Have regard to the 'Secured by Design' standards.</li> <li>Safeguard the amenity of neighbouring properties. Separation distances should generally be a minimum of 14m between principal windows of existing homes and walls of new buildings without windows, and 22m where habitable rooms would be in direct alignment.</li> <li>Provide appropriate facilities including cycle storage, amenity areas and garden areas, and refuse storage and collection.</li> <li>Protect and, where possible, enhance valuable environmental (e.g. public open space) and heritage assets.</li> <li>Promote the use of sustainable design and construction that provides for efficient use of minerals (in accordance with the Surrey Minerals Plan 2011).</li> <li>Make provision for suitable new planting, trees, and boundary treatments.</li> <li>Retain existing features such as trees, hedgerows, and walls wherever possible.</li> </ul> |
| DP9                                  | Gates, Fences, Walls & Other Means of Enclosure              | <ul style="list-style-type: none"> <li>Boundary treatments must not result in adverse effects on the amenities of neighbours or on the character and appearance of the locality with regards to scale and materials.</li> </ul>   |
| DP10                                 | Green Belt   | <ul style="list-style-type: none"> <li>Reiterates national policy regarding inappropriate development in the Green Belt (GB) which will normally be refused unless VSC exist.</li> </ul>  |
| DP19                                 | Biodiversity, Geological Conservation & Green Infrastructure | <ul style="list-style-type: none"> <li>Protect, enhance, or increase the provision of, and access to the network of multi-functional Green Infrastructure.</li> <li>Promote nature conservation and management.</li> <li>Restore or create Priority Habitats.</li> <li>Requires proposals to prevent harm to and mitigate any impacts on Ancient Woodland, and deliver overall ecological benefits. In cases likely to result in harm, permission will only be made where the need for and benefits of the development in that location clearly outweigh the loss.</li> </ul>   |
| DP21                                 | Sustainable Water Management                                 | <ul style="list-style-type: none"> <li>Demonstrate that the scheme has the capacity to provide an acceptable water supply and surface water and foul drainage.</li> <li>Seek to secure opportunities to reduce flooding, such as the use of Green Infrastructure for flood storage and, where necessary, the incorporation of Sustainable Drainage Systems (SuDS).</li> </ul>   |
| DP22                                 | Minimising Contamination, Hazards & Pollution                | <ul style="list-style-type: none"> <li>Provide a noise statement including any proposed mitigation measures.</li> <li>Have no adverse impact on health, the natural or built environment or amenity of existing or proposed uses with regards to air pollution.</li> </ul>  |

Source: Tandridge District Council Core Strategy and Local Plan part 2 (Detailed policies)

- 4.16 There are no relevant policies within the Surrey Minerals and Waste Development Framework which affect the site (i.e. it is not within any safeguarding zones or similar). We set out in the following Section 7.0 how the proposed development accords with the Core Strategy and Detailed Policies.

## Other Considerations

### The Emerging Local Plan

- 4.17 In accordance with Paragraph 48 of the NPPF, weight may also be given to relevant policies in emerging plans according to the stage of preparation, number of outstanding objections and consistency with the NPPF. TDC submitted its new Local Plan for examination on 18<sup>th</sup> January 2019, under the transitional arrangements (NPPF Para 220) and as such is being examined under the 2012 version of the Framework. The emerging plan includes proposals to remove land from the Green Belt to meet a proportion of development needs, albeit the application site is not one such proposal and would remain designated as Green Belt. Notwithstanding its sustainable location, no sites were proposed to be allocated within Oxted itself, and only two sites within the wider Oxted area were proposed to be allocated, both within Hurst Green.
- 4.18 The emerging plan has been at examination for well over four years and at the time of submitting this application, the Inspector's latest letter<sup>1</sup> reiterates that significant soundness concerns (including in relation to the spatial strategy and highway capacity, the allocation of the South Godstone garden village and the plan's housing requirements) appear no nearer to being resolved, and therefore clearly sets out that he remains of the view that *"it is not possible to make the Plan sound by making main modifications to it, and that I should recommend non-adoption of the Plan"*. In addition, the Inspector notes that the submitted Plan is halfway through the plan period (2013-2033), meaning that it could not identify the required supply of housing sites, and that the protracted nature of the examination means that much of the evidence base is out of date. In considering the next steps for the examination, the Inspector concluded that:
- "The next stage is therefore for me to write my report of the examination within which I would recommend that the Plan is unsound and that it is not adopted. That would bring the examination to a close... I consider it appropriate to suggest that the Council may wish to consider withdrawing the Plan before any such recommendation was made. This would save the expense associated with me writing and issuing a report of the examination"* (Emphasis added).
- 4.19 In response to this, the Council, at their Planning Policy Committee Meeting on 21 September 2023, resolved to ask the Inspector to conclude the examination by writing his final report. It is therefore expected that the emerging Local Plan will shortly be found unsound and be withdrawn.
- 4.20 Notwithstanding the above, the Inspector's preliminary conclusions published in December 2020 (ID16) recognised that there are *"significant difficulties in achieving sustainable development without impinging on the Green Belt boundaries and removing land from the Green Belt"* and that at a strategic level, exceptional circumstances do exist to alter

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<sup>1</sup> TDC Local Plan Examination – Inspector's Letter ID26 (dated 10 August 2023) available [here](#)

Green Belt boundaries to meet need. His preliminary view was also that the objectively assessed need ('OAN') for housing in the District should be in the region of 450 to 495 dwellings per annum (dpa).

4.21 In this context, we refer below to only those draft policies of most relevance to this application; primarily important policies relating to Green Belt and strategic growth in the District. This includes the following:

- **TLPo1 (Spatial Strategy)** – set out a requirement for new homes over the plan period, with those to be directed towards the most sustainable settlements (Tier 1 and Tier 2).
- **TLPo3 (Green Belt)** – set out a new extent of the Green Belt within the District, which included the release of land from the Green Belt to make provision for new housing allocations.
- **TLPo6 (Urban Settlements)** – identifies Oxted as one of the seven urban (Tier 1) settlements (alongside Limpsfield and Hurst Green, among others). The urban settlements will be a focus of development.

### Other Guidance

4.22 In addition to the Statutory Development Plan and emerging policy, the following documents have been referenced in developing our proposals:

- Parking Standards SPD (2012)
- Trees and Soft Landscaping SPD (2017)
- Tandridge Housing Strategy (2019)
- Surrey Hills AONB Environmental Design Guidance (2019)<sup>2</sup>

### Overview of Key Policy and Material Considerations

4.23 The prevailing policies across the various documents establish several policy themes to assist in the consideration of the proposed development. These themes have been grouped together in structuring Section 7, which assesses the planning application against the Development Plan and other material considerations.

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<sup>2</sup> Surrey Hills AONB Environmental Design Guidance (2019) available [here](#).

## 5.0 Housing Need, Supply and Delivery

- 5.1 There is a fundamental and acute need for each of the homes proposed as part of this planning application. This is demonstrated by a significant body of evidence – including a variety of independent and Government commissioned research – that shows the UK is in the throes of a national housing crisis, and that this is most acute in areas where affordability is worst, such as Tandridge. Significantly boosting the provision of homes is therefore a Government priority and one that is central to the social objective of sustainable development in the NPPF, and LPAs must demonstrate a five-year housing land supply (5YHLS) (NPPF Paragraph 74).

### Housing Need

- 5.2 At a District-wide level, the adopted Local Plan (Core Strategy Policy CSP 2) seeks to provide at least 2,500 new homes over the plan period 2006-2026, equating to 125 homes per year. However, the Core Strategy was adopted in 2008 and drew its housing requirement from the now revoked South East Plan (2009).
- 5.3 The emerging Local Plan proposes an average housing requirement of 303 dpa across the 20-year plan period, albeit it recognised that the OAN is likely to be far higher, with figures ranging from the Council’s revised calculation of 398 homes per annum to the Inspector’s preliminary view that it should be in the region of 450-495 homes per annum. It should also be noted that the Council’s latest evidence on housing need (updated SHMA Affordable Housing Needs Assessment, June 2018) identified an annual need for 310-391 affordable homes per year – a figure that is higher than the *overall* housing delivery target set out in either the adopted or emerging plans.
- 5.4 Notwithstanding, until such a time as a new Local Plan is adopted, and when it is reviewed in the future, the NPPF (Para 61) makes clear that assessing housing need should be conducted using the standard method. As set out in the 5YHLS Assessment appended to this Planning Statement, the standard method figure for Tandridge is currently 639 homes per year (albeit a figure of 642 dpa is used for the purposes of calculating the 2022-2027 5YHLS). This is considerably higher than any housing requirement currently set by policy.
- 5.5 The acute need for *affordable* housing within the District and local area is also confirmed by a range of housing affordability indicators and other evidence, including:
- 1 As of September 2022, the lower quartile house prices (i.e. most affordable) in Tandridge was **£365,000**, more than double the national average of £180,000 and markedly higher than the regional average of £270,000<sup>3</sup>. The lower quartile private monthly rent recorded between April 2022 and March 2023 in Tandridge was also **£1,050**, higher than the regional average (£810) and the national average (£625)<sup>4</sup>.
  - 2 The 2022 median affordability ratio – average house prices to average earnings – for Tandridge (**14.97**, c.f. 8.28 England) places the District within the **top seven least affordable** local authorities outside of London to live in the entire country<sup>3</sup>. This means that average full-time employees in Tandridge can typically expect to spend around 15 times their earnings on purchasing a home in the District.

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<sup>3</sup> ONS House Price to Workplace-based Earnings Ratio (March 2023 Release)

<sup>4</sup> ONS Private Rental Market Statistics (June 2023 Release)

- 3 As of December 2022, there were **1,869 households registered on the waiting list** across the District<sup>5</sup> (an increase of 161 households from the previous year). Of this number, 45 households were registered as being in urgent housing need (Band A), with a further 421 in high need (Band B). One-quarter of those households on the waiting list across the District are therefore in an urgent or high housing need.
- 4 The Council's updated SHMA Affordable Housing Needs Assessment (2018) sets out a calculation of the affordable housing need by individual parishes. This concludes (at Table 3.6) that the net **affordable housing need in Oxted is for 40 homes per year**, which accounts for one of the highest proportions (10%) of the District's total affordable housing need.

## Housing Supply & Delivery

- 5.6 In recent decisions, the Council has stated that it accepts that it does not have a 5YHLS. This reflects the Council's latest 5YHLS position which is published within the latest Annual Monitoring Report ('AMR') (published November 2022); the only scenario in this report which accords with current policy and guidance determines that currently, the Council only has a supply of 1.57 years, which is equivalent to a shortfall of 2,638 homes. However, our review of this position and the Council's purported supply – detailed within the 5YHLS Assessment appended to this Statement (Appendix 1) – concludes that only 1,016 homes should be considered actually 'deliverable', resulting in a demonstrable supply of 1.38 years at best. What is clear is that by any measure, the scale of the shortfall is very significant indeed, and that there is an urgent need to bring forward new housing land supply.
- 5.7 The significance of this shortfall is also material and should be considered in the determination of this application, and this is further compounded by the fact that there appears to be little prospect that housing needs (as identified by the standard method) will be met soon:
  - The evidence within Tandridge's AMR (2022) suggests that until a new Local Plan is adopted, there is limited scope for any marked improvement in the 5YHLS position in the short term, due to the 'overwhelming' scale of Green Belt constraint in the District.
  - The shortfall against the standard method local housing need figure will remain significant even with the adoption of a new Local Plan, which will likely (as with the current emerging plan) seek to set a housing requirement figure that is considerably below any estimates of housing need.
  - As set out above, the emerging plan has now been at examination for well over four years and at the time of submitting this application, it has not been found sound and will likely be withdrawn. The failure of the emerging plan leaves no mechanism in place for TDC to improve or secure a 5YHLS through plan-making, and this delay is leading to sustained and worsening housing delivery outcomes in the District.
- 5.8 The Housing Delivery Test ('HDT') (2021) results also show that the Council had only delivered 38% of its required housing over the past three years. As a result, it is currently the 6<sup>th</sup> worst performing local authority across the country, out of a total 321 areas

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<sup>5</sup> Freedom of Information (FOI) Request response dated 21 December 2022

measured for the HDT. In previous years, the Council's delivery record has not fared much better – in 2020, the result was 50%, in 2019 it was 50% again, and in 2018 it was 65%.

5.9 In terms of affordable housing delivery, Table 2 in the Council's latest AMR (2022) indicates that an average of just 68 affordable homes have been completed annually in Tandridge since 2006 (the start of the Core Strategy period). This represents just 25% of the overall housing delivery over this period (an average of 275 homes per year), and is significantly short of meeting the identified need for 310 – 391 affordable homes per year.

5.10 Further, a high-level review of future supply identified by the Council – detailed in the 'residential outstanding capacity' (Appendix 4) in the latest AMR – does not suggest that there are any sites of a significant scale coming forward in Oxted. There are just 65 units included within the identified supply over the next five years within the Oxted parish, spread across 25 different sites (equating to just 13 homes per year), only one of which comprises major development that would deliver or contribute to affordable housing. This compares with the identified need for at least 40 affordable homes per year in the parish.

## Summary

5.11 The Council's 5YHLS position is exceptionally severe, and there has been a continued failure to deliver the homes needed in the District and wider area, partly due to a lack of a new Local Plan coming forward. This means that insufficient numbers of new homes are coming or will come forward as allocations to help rectify past under supply in the future.

5.12 It is clear that NPPF Paragraph 11d applies and the policies most important for determining the application are out-of-date, as a result of both TDC being unable to demonstrate a five-year supply of deliverable housing sites *and* having delivered a level of housing that is substantially below the housing requirement over the previous three years.

5.13 The proposed scheme would deliver 116 new homes including 46 high-quality affordable homes for rented and intermediate tenures, presenting an opportunity to deliver much needed affordable homes in a sustainable location. Given the Council's poor historic delivery of housing compared with the level of current and future needs, the provision of up to 46 affordable homes (40% and in excess of the adopted policy requirement of 34% but reflecting the acute needs that exist) would make an important contribution in addressing affordable housing pressures in the District. As set out earlier in this section, the NPPF affords great weight to boosting the supply of homes and meeting affordable housing need, particularly in the context of a national housing crisis.

5.14 Taken together, the evidence shows that there is an acute housing and affordable housing need across the District, and that it is unlikely that this will be addressed in the near future. The Inspector in the Land West of Limpsfield Road, Warlingham, appeal decision described the affordable housing situation in Tandridge as "*extremely bleak*". The emerging Local Plan will soon be withdrawn (and even then did not seek to provide for the identified annual affordable housing need which is higher than the total annual requirement). The lack of potential housing supply solutions will contribute to worsening affordability in the area.



## 6.0 Principle of Development

- 6.1 Core Strategy Policy ('CSP') 1 seeks to promote sustainable patterns of travel by directing the majority of new development towards the existing built-up areas of the District within Category 1 settlements, including Oxted (alongside Caterham, Warlingham and Whyteleafe). As the site is located on the edge of Oxted and in close proximity to the station and shops, it is considered to be a highly sustainable location for housing development and in line with the spatial strategy set out within the Core Strategy (focusing growth on Category 1 settlements). Oxted provides a good level of accessible services and facilities, and the site itself is well located for walking, cycling and public transport; it is approximately 450m north of the centre of Oxted (around 6 minutes' walk), 600m northeast of Oxted train station (around 7-8 minutes' walk), and 60m (c. 2 minutes' walk) from the existing bus stop outside St Mary's School that will be retained and enhanced as part of the proposed development.
- 6.2 However, it is recognised that the whole site is currently designated as Green Belt in the adopted Development Plan and as such, the proposed development for the scale and type of housing proposed constitutes, by definition, 'inappropriate development' (NPPF Paragraph 149, TLP Part 2 Policy DP10). The proposed development site is also adjacent to the Surrey Hills AONB.
- 6.3 The principle of development, as it stands, is not in accordance with the land's designation as Green Belt and therefore it is necessary to demonstrate 'Very Special Circumstances' (VSC) whereby the potential harm to the Green Belt, and any 'other harm' resulting from the proposal, must clearly be outweighed by other considerations (NPPF Paragraph 148). What constitutes VSC is a matter of planning judgement, however it is widely acknowledged that factors forming VSC do not in themselves have to be rare or unique<sup>6</sup>; indeed, the aggregation of commonplace factors can combine to create VSC.
- 6.4 In this context, this section assesses the principle of residential development at the site against relevant planning policy. In doing so, it sets out the VSC case for the scheme, including an assessment of the effect of the proposals on the AONB and the Green Belt and the purposes of including land within it. The subsequent section demonstrates that all other technical matters can be adequately addressed such that any 'other harm' resulting from the proposal is minimal. Therefore, as set out further below, it is considered the potential harm to the Green Belt by reason of inappropriateness and other (minimal) harms resulting from the proposal are clearly – and significantly – outweighed by other considerations, thereby justifying very special circumstances and according with policy set out within NPPF paragraph 148 and echoed within TLP Part 2 Policy DP10.

### The AONB

- 6.5 As noted earlier in this Statement (see Figure 2.3), a portion of the northwest boundary of the site, which will remain untouched, lies within the Surrey Hills AONB. Natural England recently consulted on a review of the whole AONB boundary, entitled 'Surrey Hills AONB Boundary Variation Project' which closed in June 2023. The consultation proposes several boundary extensions to the AONB designation and several minor boundary refinements.

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<sup>6</sup> Wychavon DC v Secretary of State for Communities and Local Government and Butler (2008) EWCA Civ 692

One such minor boundary refinement is proposed to cover the full application site, together with an adjoining parcel of land to the east, and bring it within the AONB boundary.<sup>7</sup> This boundary refinement is referenced as ‘Land North of Park Road’. The consultation document states that the proposed refinement would bring the boundary to the existing property boundaries on the edge of Oxted and Chichele Road. Objections were made to this, with regard to this specific site.

- 6.6 The next step – if as a result of the consultation no further amendments are sought (which would be the subject of an additional statutory consultation) – is for Natural England to draft a Variation Order and proceed with a formal Notice period on the extended areas before submission to the Secretary of State. The earliest Natural England expect this submission is mid-2024. The Notice period will comprise further consultation, where additional representations can be made, and a further period of response analysis will be required prior to any consequent changes made to the draft Order.
- 6.7 In the pre-application response to the proposals, TDC indicated that:
- “...an overriding consideration with regard to character and appearance has to be that the site is proposed as an extension to the AONB. An independent landscape assessment of the site on behalf of Natural England has concluded that the natural beauty of the site is of comparable quality to the adjacent AONB and should therefore be covered by that national landscape designation.”* (emphasis added).
- 6.8 This is not correct. For clarity, the boundary amendment in this location is proposed as a “minor boundary refinement”, essentially a ‘tidying-up’ of boundaries where there were considered to be boundary anomalies which did not follow clear features on the ground. The boundary amendment to include this site is not made as part of the AONB extensions on the basis of natural beauty; the site itself is not addressed nor referenced in the independent landscape assessment on natural beauty<sup>8</sup> (it falls outside of the EA10 area assessed) and is only addressed in the ‘minor boundary refinements tables’ within the boundary considerations report<sup>9</sup> (referred to as an “irregular field”) which does not reference or appraise any natural beauty of the site, nor its quality in respect of the AONB.
- 6.9 Further, it must be recognised that this assessment process does not currently confer any additional planning protection; at the time of submitting this application, the order has not been submitted and the main part of the site remains outside of the AONB boundary. CALA Homes has submitted a response to the recent consultation, setting out why the site should not be included within the AONB minor boundary refinement (and this is also addressed in the accompanying Landscape and Visual Impact Assessment (LVIA) to this application, contained within the Landscape and Views chapter and associated appendices of the Environmental Statement). As it stands therefore, there is no certainty that the site will be included within a boundary variation to the AONB. This is precisely the view taken by the Inspector in allowing an appeal in July 2023 for the development of up to 146 homes in Waverley<sup>10</sup>, whereby she confirmed that (Para 23):

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<sup>7</sup> Natural England AONB Boundary Review Consultation available [here](#). See Final Boundary Report Page 67 and Boundary Maps Figure 23.

<sup>8</sup> Surrey Hills AONB Boundary Review Natural Beauty Assessment (Feb 2023) available [here](#)

<sup>9</sup> Surrey Hills Area of Outstanding Natural Beauty Boundary Variation project Boundary Considerations (Feb 2023) available [here](#)

<sup>10</sup> Appeal Ref: APP/R3650/W/22/3311941 – Land at Old Compton Lane, Waverley Lane, Farnham available [here](#)

*“It is understood that Natural England would expect to submit a Variation Order to the Secretary of State for a decision by August 2023 on the extended areas. Therefore, there is no certainty that the boundary changes currently proposed would form part of the recommended review, or that the Secretary of State would confirm the variation order. Natural England advises that following the issuing of the Variation Order, but prior to confirmation by the Secretary of State, a Variation Order would carry great weight as a material consideration in planning decisions. In this case the Variation Order has not been submitted and I afford the consultation document limited weight.”*

- 6.10 This is fully addressed in our landscape assessment accompanying the application, which also considers the impact on the setting of the AONB, but at the present time, the main part of the site falls outside of the AONB. The applicant does not consider the site can, or should, be elevated to a status equivalent to that conferred upon land within the AONB – and this is not therefore a material planning consideration of relevance to the principle of development at the site.

## **Green Belt and Very Special Circumstances**

- 6.11 Having considered the site, planning context and the proposed development, we consider that a combination of factors exist that together constitute the VSC necessary to justify a grant of planning permission and would clearly outweigh any harm to the Green Belt. We address these factors as follows:

### **1. The failure of plan-making in Tandridge**

- 6.12 One of the most important ‘VSC factors’ is the failure of plan-making in the District. As set out above, the emerging Tandridge District Local Plan (2033) was submitted for examination in January 2019. It has been at examination for well over four years. Preliminary findings by the Inspector published in December 2020 found significant soundness concerns, relating primarily to the proposed South Godstone Garden Village allocation, the housing requirement and several other aspects. Significantly, it was concluded that there are Exceptional Circumstances to justify amending Green Belt boundaries within the District. The Inspector has most recently advised the Council either to withdraw the plan or that he will proceed to his issue his final report finding the plan unsound.
- 6.13 This failure of the plan-making process has led to sustained and worsening housing delivery outcomes. The likely non-adoption of the plan, for an area that is largely covered by Green Belt designation and with few brownfield sites, will mean those sustained and worsening housing delivery outcomes will extend indefinitely. The only way to rectify that failure of plan-making in the short term is to address sites and housing delivery under the Very Special Circumstances test within national policy.

### **2. A sustainable site well served by public transport**

- 6.14 The NPPF states that when reviewing Green Belt boundaries, the need to promote sustainable patterns of development should be taken into account. Where it has been concluded that it is necessary to release Green Belt land for development – as concluded appropriate and necessary via the examination of the emerging Local Plan – *‘plans should*

*give first consideration to land which has been previously-developed and/or is well-served by public transport’ (NPPF Paragraph 142).*

- 6.15 The site forms a logical extension to the settlement of Oxted and is highly accessible for sustainable modes of transport, including walking, cycling, bus and rail. As set out above, the site is 600m (c.6-7 minute walk) from Oxted train station, it is very close to bus stops and services on Chichele Road/Silkham Road and Bluehouse Lane, is adjacent to the schools, and it is within c.10 minute walking distance of the full range of shops, services and community facilities Oxted has to offer.
- 6.16 Oxted is identified in the Core Strategy as a Category 1 Settlement, providing key services and day-to-day needs for the District’s population (it retains a ‘Tier 1’ status in the emerging Local Plan). It is further identified in the Council’s Settlement Hierarchy study (Addendum June 2018) as the highest scoring settlement in the District, drawing together a range of sustainability metrics. Oxted is therefore recognised as the most sustainable settlement within the District, and accordingly is identified by the Council as a preferred location for growth within the emerging Local Plan (draft Policy TLPO1: Spatial Strategy). By comparison, the site is closer to the train station and better served by public transport than several of the other Green Belt sites sought to be allocated within the emerging Local Plan (including the two for Oxted, both within Hurst Green).<sup>11</sup>
- 6.17 Further, the site is identified as suitable and developable within the Council’s Housing and Economic Land Availability Assessment (HELAA)<sup>12</sup>. Given the scale of the District’s housing need, the site would have a significant role to play in achieving sustainable development within the District, minimising the need to travel by private car, and maximising opportunities for walking and cycling for day-to-day needs.

### **3. A very substantial housing land supply shortfall**

- 6.18 It is a Government priority to boost the supply of new homes (NPPF Paragraph 60), and Local Planning Authorities must demonstrate a five-year housing land supply (5YHLS) (NPPF Paragraph 74). The Council has stated that it accepts that it does not have a 5YHLS, assessing this at 1.57 years in the November 2022 AMR. Our accompanying 5YHLS review (Appendix 1) concludes the deliverable supply is even lower at 1.38 years at best. Combined with that Tandridge’s most recent Housing Delivery Test (‘HDT’) (2021) results also show that the Council had only delivered 38% of its required housing over the past three years; the 6<sup>th</sup> worst performing local authority across the country.
- 6.19 The significance of this housing supply shortfall is material and should be considered in the determination of this application and the consideration of VSC, with regard to the presumption in favour of development (NPPF Paragraph 11d). The greater the degree of shortfall, the greater weight the shortfall must be given in the balancing exercise, and the shortfall is exceptionally severe. The extent of the 5YHLS shortfall is further compounded by the fact that there appears to be little prospect that housing needs (as identified by the standard method) will be met soon, without Green Belt sites being approved with VSC.
- 6.20 The April 2023 appeal decision for ‘Land West of Limpsfield Road, Warlingham’ (Ref: APP/M3645/W/22/3309334) at paragraphs 93-96 indicates particularly that *the “acute*

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<sup>11</sup> See for example the Local Plan Sustainability Assessment (Volume 2) Tables 41 and 42.

<sup>12</sup> See TDC Housing and Economic Land Availability Assessment (HELAA) 2017-2018 (Appendix 3) Site Reference OXT 006.

*and persistent housing supply shortfall”* in Tandridge was a substantial contributory factor to there being Very Special Circumstances in that case; and the same continues to apply.

#### **4. Affordable housing delivery**

- 6.21 As well as, or perhaps because of, a shortfall in overall housing delivery within Tandridge, the area faces acute affordability pressures and a high need for affordable housing. As set out earlier, there are over 1,800 households on the housing waiting list, there is a need in Tandridge for between 310 and 391 affordable homes per year against average delivery of just 68 affordable homes per year, and in just Oxted alone there is a need for 40 affordable homes per year.
- 6.22 The scheme, with 46 proposed affordable homes – 40% of the total and significantly in excess of the Policy CS4 requirement of 34% – would make a significant and very important contribution to the affordable housing needs of the District, and bring with it important benefits that affordable housing brings to creating mixed, balanced and healthy communities (see Appendix 2 below).

#### **5. The need to release Green Belt**

- 6.23 The emerging Local Plan evidence base and process highlights that there is a very limited amount of developable urban land to meet the local needs for market and affordable housing; and the failure to do so would generate substantial adverse housing, social and economic outcomes for families and households in the District and Oxted who would be less able to access housing, would continue to see worsening affordability, and/or may need to travel further distances from outside the Green Belt.
- 6.24 The need to release Green Belt land is therefore recognised both by TDC and the Inspector in the emerging Local Plan, with the Inspector’s preliminary findings concluding that Exceptional Circumstances exist to alter the Green Belt boundaries, and that the release of Green Belt land is necessary to go any way towards meeting the District’s housing needs.
- 6.25 Further, there is a fundamental lack of alternative preferable sites to Chichele Road on which to do so, as set out in the Council’s own evidence base (specifically the Green Belt Assessments and HELAA). Importantly, the Local Plan process failed to identify or bring forward sufficient proposed allocations to address housing needs and the evidence base clearly states that there is wholly insufficient brownfield capacity in the District – indeed, only 11 out of the 132 potential housing sites considered to be deliverable or developable in the HELAA are not currently located in the Green Belt, with a total urban capacity of just 278 homes.
- 6.26 More specifically, Oxted is identified as a Tier 1 settlement and one of the most sustainable locations within the District to deliver homes to meet local housing needs. But despite this, the emerging Local Plan only identified two proposed allocations in the wider area of Oxted – and only one to be released from Green Belt – both within the Hurst Green Parish and none within the Oxted or Limpsfield Parishes. The Chichele Road site is a suitable and highly sustainable site, and one which accords with the spatial strategy. In that context, it is considered that there are limited preferable alternative sites – across the District or within Oxted itself – to deliver the homes that Tandridge will inevitably need to accommodate on greenfield sites within the Green Belt.

6.27 The Council's Green Belt Assessment Part 3 (Appendix 1) assesses the site ('OXT 006') and concluded that the site would be sustainable and that development could be appropriately mitigated (including minimising the impact on the Green Belt), but set out that "*as a matter of planning judgement*" the site should not be removed from the Green Belt, principally related to the identification of new boundaries and the overarching Green Belt purposes of preventing sprawl and safeguarding from encroachment. However, in this respect, the site has no greater impact on the Green Belt within the Green Belt Assessment than other similar sites the Council had assessed and concluded to be suitable for release.

## **6. Limiting harm to the Green Belt and preserving the AONB**

6.28 The proposal comprises inappropriate development and, therefore, it is recognised that the effect of the proposal on the openness of the Green Belt and the purposes of including land within it must also be considered. Paragraph 137 of the NPPF states that:

*'the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence'*.

6.29 While the proposed housing development would result in the introduction of new homes on an open field where there are currently no homes, and this will inevitably cause some harm to Green Belt 'openness', this harm needs to be considered within the context of the site and the degree of that harm.

6.30 The site is currently bounded by the backs of residential properties along Chichele Road and the two school sites east and west of the field, with their various built form and uses. A belt of ancient woodland along its north and western boundaries, hedgerows to the east, and topography, with a ridge towards the centre of the site, means the site is visually contained from the more open landscape to the north. The site is not the subject of any landscape quality designations, and the visual analysis within the accompanying LVIA (contained within the Environmental Statement) concludes that in all viewpoints where the site and proposed development would be visible, it would be seen in the context of the settlement of Oxted.

6.31 While the changes brought about by the proposed development would result in visual changes to the area and reduce the 'openness' of the site, this would be very localised in impact as development would not extend beyond the existing urban form that surrounds the site. In addition, retention of existing vegetation combined with new landscaping would serve as a buffer to the site's northern/north eastern boundary and further limit views of the site from the open fields beyond.

6.32 The Council's Green Belt Assessment identifies the site as serving two of the Green Belt purposes (i) preventing sprawl and (ii) safeguarding the countryside from encroachment. However, it is considered that the site scores weakly against these purposes and the broad function and purpose of the wider Green Belt in this location would remain. This is because the site's location, size and topography are in keeping with the settlement form and existing development. The proposed development would not substantially extend the built-up area and would instead infill a gap in the built-up area. The Council's site assessment (OXT 006) reflects this, recognising that development "*impact could be minimised by siting it in the most visually contained section of the site, in addition to using sensitive design, buffers*

*and landscaping...*” whilst also identifying the need to provide a new robust and defensible Green Belt boundary, which the Ancient Woodland belt and existing hedgerows would be able to.

6.33 Essentially, because the site’s character is more significantly influenced by the urban edge with development on three sides and separate from the wider countryside, the harm to the Green Belt purposes of sprawl and encroachment is considered to be limited. The site’s location adjacent to existing built form and its self-contained nature mean that the development could be accommodated within this part of the Green Belt whilst maintaining the integrity and function of the wider Green Belt.

6.34 Further the LVIA contained as part of the Environmental Statement concludes that there would be no direct effect on the setting of the AONB, with the indirect effects limited to partial views from a limited number of locations within the AONB whilst not introducing elements/forms not already present in those views. In that context, impacts would be negligible.

## **7. Open space, play and enhanced accessibility**

6.35 The proposals include a large and centralised open space providing a Local Equipped Area of Play and a smaller local area of play to the east of the site. This area is sized and specified to be above the requirement to address the needs of the development; the policy requirement is for 0.05ha/1,000 population for play provision, necessitating 140 sqm of play provision, with the scheme providing 390 sqm of play and an associated walking trails, set within a central green space. This directly responds to identified needs within Oxted and Limpsfield, where the Tandridge Open Space Strategy 2021-2025 and earlier Open Space Assessment identifies access deficits to children’s play space within Oxted and access deficits and quantity shortfalls of children’s play space in Limpsfield (with the site being walkable and serving a catchment across both). The high-quality new opportunities for play that the scheme would bring would help address those needs, providing wider benefit to the community and not just to the residents of the development.

6.36 The proposals also open up this site and routes to formal access for recreation. As set out above, the site and routes around it have been used as informal footpaths (despite the site being closed off to the public) for walkers for many years, which culminated in a proposed Public Right of Way Order which was not confirmed. The proposed development would formalise public routes through the site; potentially offering an opportunity to link through to PRoW Footpath 75 to the east (subject to separate agreement with the adjoining landowner). This enhanced accessibility through the site, and potentially beyond (which could be secured via S106), would give enhanced accessibility to the Green Belt and AONB from the centre and north Oxted.

## **8. High quality and sustainable design**

6.37 The design of the scheme has been sensitively developed to provide a development which reflects guidance on design and the local context. The design of the scheme and how it has evolved to respond to the opportunities of the site are set out in the accompanying Design and Access Statement and reflect the requirements at NPPF Paragraph 134 on design as well as within the National Design Guide.

- 6.38 Further, the new homes have been designed to be far in excess of both TDC's policy requirements on energy efficiency and sustainable design standards, as well as current building regulations. The proposed houses would be constructed using timber frame systems, reducing embedded carbon and providing exceptional insulation properties. Each of the proposed homes would also be gas-free, with houses to be heated via air-source heat pump and apartments through hot water heat pumps. Larger homes (all south-facing four and five-bedroom properties) would also have solar photovoltaic panels on their roofs, meaning the development will contribute directly to renewable energy generation. Electric vehicle charging points will be provided to all homes and a car club can also be provided by CALA, giving opportunities for people to live car-free and use shared rented cars.
- 6.39 Overall, this means that the proposed specification of the scheme will be delivering a total carbon efficiency saving of 69.8% from the implementation of fabric efficiency measures and on-site renewable energy sources, which significantly exceeds the requirements set out both in current local planning policy (20%) and existing building regulations (31%). This is evidenced within the accompanying Energy and Sustainability Assessment. It will set a new benchmark for how sustainable construction can be achieved within Tandridge, and combined with the sustainable location being a large incentive to reduce car usage, it can be an exemplar for the area.

## **9. Economic and Social Benefits**

- 6.40 The accompanying Benefits Statement (Appendix 2) provides a full, detailed assessment of the economic, social and wellbeing benefits that would arise from the proposed development. Essentially, the proposed residential-led scheme represents an important opportunity for investment within the settlement of Oxted and the provision of new housing will generate a range of economic impacts that will make a contribution to the local economy and community.
- 6.41 The quantifiable impacts of the proposed development relate to the direct and indirect creation of new jobs, construction investment, additional economic output and increased local spending. This includes supporting around 119 direct construction jobs during each year of construction, as well as a further 144 jobs in services and other businesses from the increased wage spending of construction workers and supplier outsourcing per year. The construction activity is estimated to generate £11.2 million direct GVA and £13.6 million indirect and induced GVA per annum, which is a significant contribution to the local economy.
- 6.42 Beyond the construction period, the occupation of the residential development would also deliver a significant boost to the local economy by generating 'first occupation expenditure' of £385,000 on home goods, as well as £3.7 million of expenditure per year in shops and services, of which £1.6 million each year is estimated to be retained within Oxted, supporting local jobs and the local economy.
- 6.43 In addition, the proposal would generate a range of more qualitative social benefits including the provision of open space, providing new – and affordable – homes for local people and making a notable contribution to economic and planning policy objectives for the District. This would have indirect economic benefits by alleviating local housing affordability issues, reducing homelessness (and the societal costs associated) and



increasing productivity, through improved opportunities for community development and community interaction.

## Summary

- 6.44 In conclusion, the scheme will bring significant economic, environmental, social and housing benefits to the locality, the District and the wider area. While there would be some harm to the Green Belt, by reason of inappropriateness and some limited loss of openness to the land at Chichele Road, such harm would be at the lower end of any scale. There is no other harm that would arise from the proposed development (see Section 7 below) and the proposed scheme will deliver a range of substantial benefits which significantly and demonstrably outweigh this limited harm.
- 6.45 As set out earlier, the only way to address the acute need for new homes in the District and help rectify the shortfall in housing delivery in the short term is through the VSC test. This is a relevant material consideration that supports the principle of development at the site. Furthermore, the proposals align closely with Tandridge District Council's priorities and strategies for the District, providing development in one of the Districts principal and most sustainable settlements. Whilst very special circumstances is a high-bar, it should not be applied as, or characterised as, an impossible bar to clear. In the context that this is one of only a very few suitable sites throughout the District upon which to meet needs in accordance with the spatial strategy, the circumstances are therefore very special.
- 6.46 Overall, it is considered that the following series of considerations represent the VSC necessary to justifying a grant of planning permission at the site:
- 1 There has been a failure of plan-making in the District;
  - 2 The site's location is highly sustainable and well-served by public transport;
  - 3 Tandridge has a substantial shortfall in housing delivery and acute affordability pressures;
  - 4 40% affordable housing delivery in excess of the policy requirement (34%) will help address those acute needs;
  - 5 Release of Green Belt is necessary to meet needs and there is a fundamental lack of suitable site alternatives (as concluded by the emerging Local Plan Inspector);
  - 6 The site would limit harm to the Green Belt (and have negligible effect on the AONB);
  - 7 On-site open space and play, as well as enhanced accessibility, will provide important local community benefits;
  - 8 The proposed homes are of high design quality and far in excess of policy requirements on energy efficiency and sustainable design standards; and
  - 9 The provision of new housing will make an important socio-economic contribution to the local area, generating a range of economic, social and wellbeing benefits.
- 6.47 As Policy DP10 allows for the grant of planning permission where VSC exist, it is therefore considered that the proposals are in compliance with TLP Part 2 Policy DP10 and is, by extension, in accordance with the Statutory Development Plan and the NPPF. The proposal would also assist TDC in meeting its housing needs in accordance with Policy CSP 1, and

would promote sustainable patterns of development in line with the NPPF. As it is considered that VSC exist, this also means that the site's designation as Green Belt does not provide a 'clear reason' for refusing development and that the presumption in favour of sustainable development continues to apply, in line with NPPF Paragraph 11d.

## 7.0 **Assessment of Proposed Development**

7.1 This section provides a comprehensive assessment of the proposed development against the remaining relevant policies in the NPPF, Development Plan and other material considerations outlined above, beyond the principle of development. These policies inform the following planning considerations, which represent the other key policy issues against which the planning application should be considered:

- Housing Provision
- Scale, Layout & Design
- Transport, Access & Parking
- Public Open Space
- Landscape & Visual Impact
- Heritage
- Noise
- Air Quality
- Ecology, Biodiversity & Trees
- Flood Risk & Drainage
- Sustainability & Renewable Energy
- Impact on Local Services
- Environmental Statement

7.2 For the purposes of this assessment, the proposed development is assessed primarily against the adopted Core Strategy (2009) and Detailed Policies (2014), with reference to the emerging Local Plan (2019) where appropriate, notwithstanding that the most important policies for determining this application are out of date – meaning the presumption in favour of sustainable development therefore applies – and that the emerging plan is very likely to be withdrawn or found unsound in the near future.

### **Housing Provision**

#### **Housing Mix**

7.3 The scheme seeks to provide an appropriate mix of housing types and sizes to meet the needs of different households within the wider community. This allows residents to remain in the locality as their housing needs change and helps build balanced and mixed communities.

7.4 As set out within Section 3.0 of this Statement, the overall proposed housing mix is for 15% one bedroom homes, 34% two bedroom homes, 31% three bedroom homes, 11% four bedroom homes, and 9% five bedroom homes. This includes a mix of houses and apartments and will provide a range of larger detached and semi-detached family properties, as well as smaller homes for first-time buyers and the potential for two custom build plots.

- 7.5 In establishing what will be considered an appropriate mix of dwelling sizes, Policy CSP 7 requires developments to have regard to the identified needs in future Housing Need Surveys and Strategic Housing Market Assessments (SHMAs). The latest evidence for Tandridge comprises the 2018 SHMA; it identifies that the overall need of housing required (both market and affordable) in the District is for 10% 1-beds, 26% 2-beds, 35% 3-beds and 29% 4+ beds. This is also referred to in the Council's Housing Strategy 2019-2023. Importantly, in setting out this need, the Council also note that there is a high proportion of larger executive homes in the District and that they would like to readdress the balance through the provision of smaller properties that are more affordable. As set out in Table 7.1, the overall proposed mix is in general accordance with this mix and would make an important contribution to the provision of smaller properties, with almost half (46%) of the proposed homes comprising one or two-bedrooms.

Table 7.1 – Proposed overall housing mix vs. policy housing mix

| No. of Bedrooms | Proposed housing mix | TDC housing mix required up to 2033 (SHMA 2018) |
|-----------------|----------------------|---|
| 1 bed           | 15%                  | 10%   |
| 2 bed           | 34%                  | 26%   |
| 3 bed           | 31%                  | 35%   |
| 4+ bed          | 20%                  | 29%   |

Source: TDC 2019 Housing Strategy and 2018 SHMA

- 7.6 Further, in order to reflect the need for smaller properties in the District, the Housing Strategy seeks to limit the provision of larger housing, providing guidance that between 30-40% of the market housing should be three bedrooms and no more than 30% should be four or more bedrooms. The proposed housing mix of the 70 market homes is for 28.5% two bedrooms, 38.5% three bedrooms, and 33% four or more bedrooms. The mix therefore broadly complies with the guidance contained within the Housing Strategy, which is similarly based on the 2018 SHMA evidence (which in itself is based on the 2011 Census) and the proposal has been developed to ensure that the mix of both affordable and market housing delivered reflects changes to demographic trends, local characteristics, and drivers of the housing market (for example fundamental shifts including that many households now demand an extra room to act as a dedicated workspace<sup>13</sup>) so that the housing needs of different types of households are effectively met.

### Affordable Housing

- 7.7 The proposed development will provide 46 new affordable homes, as defined by the NPPF. This equates to 40% affordable housing provision, which would meet and exceed the requirement set out in Policy CS4 (up to 34%) reflecting the acute affordable housing needs that exist within the District (as set out above and within the Benefits Statement appended to this Statement).
- 7.8 The delivery of 46 affordable units as part of the wider 116-home development will be provided on the site and will be tenure blind, indiscernible from and well-integrated with the general market housing. In terms of the affordable housing mix, this consists of 39% one bedroom homes, 41% two bedroom homes and 20% three bedroom homes. The layout

<sup>13</sup> See Working from Home: Planning for the new normal? Lichfields (December 2021) available [here](#)

of the site and location of the proposed affordable homes within it is set out in the accompanying DAS.

7.9 Appendix 3 to this Statement also sets out the information required by the Affordable Housing Statement requirement as part of Tandridge's Local Validation Checklist.

7.10 In summary, it is considered that the principle of housing development of the scale, quantum and type proposed at the site is consistent with local planning policy and will provide an appropriate mix of housing types and sizes to meet current local housing needs, in accordance with Policy CSP 7. The delivery of 116 new homes at this site will also support the Government's objective of significantly boosting the supply of homes, with a sufficient amount and variety of land coming forward where it is needed (NPPF Paragraph 59).

## Scale, Layout & Design

7.11 The Design and Access Statement (DAS) submitted with the application sets out detailed information on the scale, layout, and design of the development. Given the currently undeveloped nature of the land, the proposed development has sought to respond to the opportunities and constraints of the site, particularly in respect of the topography of the site, important features that need to be retained, existing development bordering the site and the adjacent Ancient Woodland.

7.12 Where possible, the proposed new homes have been positioned in order to safeguard the amenity of existing residents and reduce impacts upon the surrounding areas; this includes the setting back of development to the southern and eastern boundaries, using back gardens to increase buffers to neighbouring properties and extensive new planting to help soften and partially screen the development. The design of the proposed development also incorporates a 15m buffer to the Ancient Woodland on the northern and western boundaries, with new landscape planting alongside the retention, strengthening and gapping-up of existing trees and hedgerows along the site boundaries. In addition, the proposed development also makes provision for appropriate facilities for all new homes, including cycle storage, amenity areas and garden areas, and refuse storage and collection.

7.13 Overall, the high design quality of the development ensures that the proposal accords with Policies CSP18 and DP7.

7.14 With 116 homes proposed on the 6.36ha site, the overall proposed gross density of the scheme is approximately 18 dwellings per hectare (dph). Excluding the woodland area and looking just at the development area (as per Local Plan Part 2 footnote 12) the net density of the scheme is approximately 30 dph. This is within the 30-55 dph range set out within Policy CSP19 for development in 'the built-up areas', and being at the lower end of the range it further accords with the supporting text which recognises that in certain locations it will be necessary to limit densities to avoid a development that is out of character with its surroundings. The proposed number of homes (116 units), net density (30 dph), scale and layout of the scheme is therefore considered to be appropriate for the site. It reflects the following important considerations:

- The nature of the land and the site's immediate surroundings; the proposed development seeks to protect and preserve the setting of open fields and landscape beyond the site to the northeast (e.g. by limiting height), while respecting the clear and defensible boundaries to the existing field.

- The prevailing character of residential properties neighbouring the site and in the surrounding local area, including Oxted more generally, which are generally characterised by lower densities and larger properties.
- The delivery of a significant quantum of open space elements within the site and the requirement for sensitive landscape buffers to the adjoining Ancient Woodland and site boundaries.
- Making effective use of land; the proposed layout still promotes an effective use of land while seeking to meet other policy requirements, such as drainage, parking standards and private amenity space standards.

7.15 In this context, the design of the proposed scheme provides an appropriate balance with existing policy, the site's surrounding context, and the need for a sensitive development which reflects the current status of the site.

## **Transport, Access & Parking**

7.16 Safe and suitable vehicular access to the proposed development will be provided from a widened access point onto Chichele Road to the southwest of the site, between no. 32 Chichele Road and St Mary's CoE Primary School. A secondary pedestrian/cycle access point will also be provided via a footpath to the south of the site to link up with existing access onto Bluehouse Lane, adjacent to Hazelwood School. As set out in further detail earlier in this Statement, the site is in a highly sustainable location close to existing shops, services and public transport opportunities to encourage walking and cycling for work, school or other trips.

7.17 The application is supported by a Transport Assessment which demonstrates how the proposed residential development:

- Makes appropriate provision for parking and servicing in accordance with Policy CSP12 and the adopted Parking Standards SPD; a total of 276 car parking spaces (including 39 visitor spaces) are proposed and secure cycle parking will be provided within the curtilage of each house or within covered cycle stores for each apartment, providing sufficient allocated and unallocated spaces throughout the site. All new homes (including apartments) will also be provided with fast charge electric vehicle ('EV') charging points, in accordance with the current minimum requirements.
- Makes provision for safe and suitable access for private cars, emergency vehicles, pedestrians and cyclists, integrating within the existing highway network in accordance with Policies CSP12 and DP5, and Surrey County Council's ('SCC') highway design standards. Pedestrian access points are proposed around the site to formalise and maximise sustainable existing connections, as well as a potential future link from the northeast boundary of the site to Greensland Way and the Surrey Hills beyond.
- Makes improvements to the infrastructure network in accordance with Policy CSP12, comprising the provision of traffic calming measures, a new zebra crossing and improvements to the existing bus stop adjacent to St Mary's School on Silkham Road (60m from the site entrance onto Chichele Road) including the provision of a bus shelter, lighting and real time passenger information display.

- Would be served by existing transport infrastructure without detriment to their operation, in accordance with Policy DP5. The proposal for 116 new homes would result in a slight increase in traffic generation, however it would have a negligible impact on the operational capacity of both J6 of the M25 and the surrounding road network, including Chichele Road itself. There are few other committed housing developments within the vicinity of Oxted, and the position of the Local Plan means the proposed development is also likely to come forward without the context of other major residential development (permitted or proposed) in the area. As such, the level of traffic growth would not cumulatively lead to significant impacts on J6 of the M25. The site also provides the opportunity to deliver modal shift towards walking, cycling and public transport options due to its reasonably unique location within the District.

7.18 A Travel Plan is also submitted alongside the application which sets out the measures that will be implemented to support residents' travel habits in meeting objectives on the use of sustainable modes of transport, including the potential for car club provision within the development. Overall, it is considered the proposed development would be acceptable in transport terms and would comply with local and national policy criteria.

## Public Open Space

7.19 The proposal includes the provision of substantial new public open space to support the development and contribute to provision within the locality and wider area of Oxted. Overall, the site will deliver around 1.2 ha of new public open space (POS) and significant landscaping buffers around its boundary and to the adjacent Ancient Woodland (far in excess of the requirements set out within Policy CSP 13, which would give rise to a need for approximately 0.34ha of POS<sup>14</sup>). A large equipped play area is provided in the centre of the site which incorporates established trees and provides valued recreational space for children, with an appropriate offset/buffer to the proposed residential properties for amenity purposes, alongside an additional smaller play area to the eastern boundary of the site with boulders for climbing or for sitting and chatting (totalling 390 sqm play provision). The plans show how the play provision includes a range of high-quality equipment including both formal play elements (slides and swings) and natural play elements (e.g. play boulders for climbing). These have been designed to use mainly wood play pieces, to complement the character of the scheme and represent a sustainable use of materials.

7.20 Combined, the open space and formal equipped play area will comprise locations with different opportunities for play for all ages. The net increase in provision from the site is significant, and more than offsets the 'need' generated by the development. Further, the play provision will provide high quality opportunities for the local community and help to address access and quantity deficits in play space in the north of Oxted and Limpsfield, as identified by the TDC Open Space Study (2017) and Open Space Strategy (2021).

7.21 Furthermore, the elements of public open space are fully integrated into the proposal, with proposed planting (in combination with sustainable drainage and biodiversity features) forming attractive spaces and routes for the schemes proposed cycle/footpaths. This

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<sup>14</sup> Policy CSP 13 sets a quantity standard of 1.27ha / 1,000 population for provision of 'playing space'; applying this to the proposed development would generate a need for c.0.34ha of space (based on a household size of 2.3 persons per dwelling and 267 people generated by the development, adopting the approach set out in the TDC Open Space Study (2017)).

connected-up design will encourage walking and cycling and help to promote opportunities for healthy and outdoor leisure time. The open space strategy also includes additional planting along the boundary to minimise views into the site as well as amenity green space both around the vehicular site entrance and the pedestrian/cycle route from Bluehouse Lane, complementing existing green infrastructure, incorporating sustainable drainage, and improving local access to open space.

## Landscape & Visual Impact

- 7.22 The design of the proposed development incorporates careful use of existing landscape features, significant new planting, as well as the strengthening the hedgerow along the site boundaries, providing a landscape buffer to create a soft green edge and transition with the wider open land beyond. The landscaping scheme reflects the prevalent character of Oxted, and it is considered that the proposed housing development would form a natural infill within the current settlement pattern, contained on three sides by residential or educational development. The Ancient Woodland included within the north/northwest site boundary will also remain undisturbed by the proposed scheme, and a significant landscape buffer to any built development is provided to protect and encourage biodiversity and complement the setting of the AONB and Ancient Woodland.
- 7.23 The application is supported by a Landscape & Visual Impact Assessment (LVIA) contained within the Landscape and Views chapter and associated appendices of the ES which concludes:
- 1 In respect of landscape character, although the scheme would be partially visible in some views within the character area, it will be largely screened by existing woodland and will be viewed in the context of the existing settlement. The impacts of the housing development on the setting of the existing landscape would therefore be of negligible significance – and retention and enhancement of existing boundary vegetation could bring positive benefits and beneficial changes alongside any minor adverse impacts. The only landscape receptor to experience a major adverse effect is the local landscape condition, by virtue of the site changing from its current rural character to an urban character.
  - 2 In respect of visual impacts and impacts on the setting of the AONB in landscape terms, that views out of and into the AONB from the site are restricted by substantial existing woodland and hedgerows along the northwest and east boundaries. The site is visually contained from the more open landscape to the north, and in all viewpoints where the site and proposed development would be visible, it would be seen in the context of the urban area of Oxted. There would therefore be limited visual effects on the AONB and the special landscape character associated with its designation, and it would continue to preserve the AONB.
  - 3 In respect of Green Belt, there is already a clearly defined boundary formed by the edge of the adjacent Ancient Woodland and hedgerows along the north and east site boundaries. The formalisation of this as a new well-defined and defensible settlement boundary will retain clear separation between the settlement edge and wider countryside, whilst providing higher amenity and potentially biodiversity within the Green Belt (consistent with Green Belt objectives). As above, the site is seen as a transitional area between the urban area and wider countryside beyond the site –



which itself is visually contained and separated from the AONB by the Ancient Woodland and hedgerows – and the form of the proposed residential development is more strongly related to and in scale with the existing settlement edge; there would therefore be limited visual effects to the openness of the Green Belt.

- 7.24 Overall, it is considered that the proposed development has been sensitively located and designed to ensure impacts on the Green Belt (both definitional and in terms of openness), and on the setting of the adjoining AONB and Ancient Woodland are minimised, and that the housing development can successfully be accommodated within the existing landscape character, in accordance with the provisions of NPPF Paragraph 176 and Policies CSP 20, CSP 21 and DP19.

## Heritage

- 7.25 As set out above, the site does not include any heritage assets (whether designated or non-designated), although there are some designated and non-designated heritage assets within the wider surrounding area, including the Church of All Saints (Grade II listed), the United Reformed Church (Grade II listed) and the Barn Theatre on Bluehouse Lane (non-designated heritage asset). The planning application is supported by a Heritage Assessment which provides an assessment of the proposed development on the significance of these heritage assets. It confirms that the proposed scheme will not directly impact on the built fabric of any heritage assets in the area, and that the significance of the surrounding heritage assets within the proximity of the site would be preserved by the proposed development. This accords with Policy DP20 and Paragraphs 194 and 197 of the NPPF.

## Noise

- 7.26 The proposed use of the site for residential development is not considered to present any noise amenity issues. Whilst the site is exposed to noise generating sources from the M25 which lies around 500m to the north, and outdoor sports pitches and playing fields from two schools (St Mary's CofE School and Oxted School) located to the immediate east and west boundaries, the application is supported by a Noise Assessment which provides a full assessment of the prevailing noise around the site and any impacts of this upon the proposed new homes.
- 7.27 The assessment demonstrates that appropriate target internal noise levels are achievable subject to inclusion of conventional mitigation measures within the design of the proposed dwellings, such as appropriate construction methods, glazing and ventilation. The layout of the proposed development also adopts the recommended acoustic design approach by screening and locating external amenity spaces from noise sources surrounding the site where possible, including the M25 to the north and outdoor sports pitches and playing fields from two adjacent schools. Further the new access road to Chichele Road and vehicle movements along it would not create any significant noise impacts on adjacent properties through its operation. This accords with Policy DP22.

## Air Quality

- 7.28 As set out earlier in this Statement, the surrounding land uses, by virtue of the site's edge of settlement location, primarily comprise residential development, nearby schools and agricultural land to the north. The main sources of air pollution in the vicinity of the site are

therefore from vehicular movements on the local road network, including Chichele Road and Barrow Green Road to the southwest of the site.

- 7.29 The Air Quality Assessment accompanying the application provides an assessment of the suitability of the site for its proposed residential end use considering both operational and construction phases, as well as further assessment of the potential for traffic generated by the proposed development to impact local air quality. It concludes that the proposed development is not expected to introduce new, sensitive receptors into an area of existing poor air quality (indeed, air quality in the local area is good, with pollutant concentrations across the site expected to be well below relevant UK Air Quality Standard concentrations), nor is it anticipated to significantly impact on local air quality. The scheme is therefore expected to comply with all relevant local and national air quality policy, including Policies CSP 18, DP7 and DP22.

## **Ecology, Biodiversity & Trees**

- 7.30 Existing habitats within the area of the site comprise largely modified grassland, alongside poor-quality bramble and mixed scrub. This provides suitable habitat for hedgehogs, bats and birds identified as part of the Ecology Assessment within the ES. Notwithstanding, the proposed development has been designed to protect and enhance features across the site, whilst promoting biodiversity. The development includes areas of ecological enhancement to the site boundaries and within open spaces, with sustainable drainage features and new tree planting, introducing both ecological and landscape benefits. Specific mitigation measures include new areas of foraging and nesting habitats for hedgehogs, including permeable fencing to allow hedgehog movements, bat boxes and dark corridors for bats, and bird boxes within new buildings. The scheme will be supported by a Construction and Environmental Management Plan (CEMP) and a Landscape and Ecological Management Plan (LEMP). Further, during construction and operation, the northwest portion of the site comprising Ancient Woodland and within the AONB will be undisturbed, with appropriate management strategies in place alongside the provision of a retained and thickened landscape buffer to protect surrounding habitats and species.
- 7.31 The application is accompanied by an Arboricultural Assessment. This identifies it is recommended to remove two trees that are in poor condition for management reasons (and irrespective of any development proposals) and 12 individual trees/groups as part of the development, with 10 of those being lower category 'C' trees, whose quality would not present a constraint. All other trees and hedges on site, including all higher quality category 'A' trees or groups on site, would be retained, whilst the planting of new trees as part of the landscape proposals would provide an overall increase in tree numbers, offsetting the losses.
- 7.32 The accompanying Biodiversity Assessment contained within the Environmental Statement demonstrates that there will be no harm to the biodiversity value of the adjacent Ancient Woodland – indeed, there will be a minor beneficial positive effect on the Ancient Woodland as it will be brought into active management to ensure no negative impact is incurred from increased residential pressure – and sets out how the scheme would contribute to improving biodiversity through ecological enhancements within the site and on other off-site land in the nearby vicinity, delivering a net biodiversity gain.

7.33 In addition, the Lighting Strategy submitted with the application shows that there are limited nighttime visual impacts expected on the neighbouring countryside and woodland as a result of the proposed development. It also demonstrates that the sensitive lighting design of the development will ensure that dark corridors are maintained around the site and that light-sensitive bat species can continue to commute around the site, specifically along the Ancient Woodland boundary.

7.34 Overall, it is considered that the proposed scheme would accord with Policies CSP 17 and DP19. The approach towards ecological mitigation and enhancement also reflects CALA's Urban Wildlife Strategy (2023) which sets out their commitment to ensuring that all new homes will incorporate a range of wildlife-friendly measures, such as travel corridors for hedgehogs, bat and bird roosting features and planting – all of which are included within the proposed development.

## Flood Risk & Drainage

7.35 As set out above, the site is located wholly within an area with the lowest probability of flooding (Flood Zone 1). There are small pockets with a low risk of flooding from surface water, but there are no nearby watercourses which affect the site. However, the Council's latest Flood Risk Sequential and Exception Tests document<sup>15</sup> supporting the emerging Local Plan indicated that the site is not sequentially preferable because there is potential for groundwater flooding to occur, while the earlier evidence<sup>16</sup> sets out that any potential groundwater flooding risk needs to be subject to individual site-specific investigations. This matter is addressed within the Flood Risk and Drainage Assessment submitted with the application, which concludes that the site is in fact at low susceptibility to groundwater flooding; the site is therefore at 'low risk of flooding' from all sources and is not subject to a need for sequential testing.

7.36 The Assessment also sets out in detail the Sustainable Drainage Systems (SuDS) proposed as part of the development, incorporated within the residential scheme including as part of the open space strategy. It is proposed to use network of SuDS basins and a geocellular soakaway, which will discharge surface water by a mixture of infiltration and discharge to the local system of drainage ditches. There are two SuDS basins (one in the east of the site and one in the west) with the geocellular soakaway located in the centre of the site where above ground there will be accessible open space. The Assessment also addresses how foul sewage can be adequately addressed. This accords with Policy DP21.

## Sustainability & Renewable Energy

7.37 The proposed development comprises highly sustainable and low-carbon homes which are designed to meet and exceed the Policy CSP 14 requirement to reach a minimum 20% saving in CO<sub>2</sub> emissions, as well as the more onerous Building Regulation L1 (2021) requirement for a 31% reduction in emissions. All new houses are proposed to be constructed in timber frame and served by air source heat pumps, while the apartments will be served by hot water heat pumps. All properties will also include EV charging points and where possible utilise local materials. In addition, the layout and orientation of the development has been considered to maximise useful passive solar gain, with all south-

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<sup>15</sup> TDC Flood Risk and The Development Allocations – Site Selection Process (January 2019) available [here](#)

<sup>16</sup> TDC Strategic Flood Risk Assessment (SFRA) Level 1 (2017) – see Appendix F Areas at risk of Ground Water Flooding, [here](#)

facing four and five-bedroom properties (equating to 20% of the overall homes proposed) including solar photovoltaic (PV) panels on their roofs. Passive measures such as green infrastructure and opportunities for cross ventilation have also been maximised where possible in line with the cooling hierarchy.

7.38 The Energy and Sustainability Assessment accompanying the application sets out how these measures proposed as part of the development will deliver an estimated total saving of 69.8% in CO<sub>2</sub> emissions (over and above building regulations) from the implementation of fabric efficiency measures and on-site renewable energy sources. Overall, this will provide exceptionally well designed and constructed new homes in accordance with Policy CSP 14, nationally set targets and CALA's sustainability targets.

## Impact on Local Services

7.39 We are aware from public consultation, and as detailed within the accompanying Statement of Community Involvement, that there are locally held concerns about the ability of local services to accommodate growth. As set out below, Tandridge is a CIL charging authority and the development will be CIL liable (with this a mandatory charge set by the Council), such that contributions will be made via CIL to mitigate the impact of the development on local services, for example in respect of schools or healthcare provision. This fully accords with Policy CSP11 which requires developer funded contributions from development.

7.40 Oxted is a Category 1 settlement and one of the principal service centres in the District providing a full range of local services within walking distance of the site. Whilst the proposed development may bring some additional population to Oxted, and therefore create additional local demand for services, it is notable that the affordable housing will be predominantly for those already with a local connection to the area and other homes will also be meeting the housing needs of people who will already be accessing such services wherever they may currently reside. In that respect a good proportion of the population who may buy or rent the new homes may already be accessing and using local services within the district. In respect of specific local services:

- **GP provision** – Oxted Heath Centre serves the town. It is currently accepting new patients onto its list. It currently has 10 serving GPs listed on its website (15 total medical practitioners) and has a patient register totalling 17,136 people (as at August 2023). This equals around 1GP for every 1,700 patients, compared to an average for the South East of around 1GP for every 1,870 patients.<sup>17</sup> This does not indicate any particular shortfall in capacity or provision of GP numbers within the town, compared to wider NHS provisions.
- **Primary Schools** – St Mary's C of E primary school is adjacent to the site. It currently has a small surplus capacity of 29 places (4.4%).<sup>18</sup> Three further schools make up the Oxted & Limpsfield primary school place planning area, Limpsfield C of E, Hurst Green Infant and Holland Junior. Across all Oxted's primary schools, there is a collective surplus capacity of 87 places (7.4%). This small surplus should also be seen in the context of Surrey County Council's School Organisation Plan 2022-2032 currently forecast a fall in reception year pupil demand within Tandridge from 2025-26 onwards,

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<sup>17</sup> NHS Business Services Authority – Catalyst Public Insight Portal

<sup>18</sup> DfE School Census – January 2023

suggesting further capacity may be arising. This does not indicate any particular constraint with primary school capacity within Oxted.

- **Secondary School** – Oxted Secondary School serves the town (and wider south of Tandridge District). It has capacity for 2,100 pupils, with 1,714 currently on roll, meaning a large surplus capacity of 386 places (18%).

7.41 Whilst it is acknowledged that housing growth and the population it brings can have an effect on the provision of local services, and local perception is that services are constrained (a similar perception to many other places), it is considered that there is sufficient provision within Oxted to accommodate the scale of growth proposed by this application and that the provision of CIL payments provide the opportunity to further enhance provision to fully mitigate any and all impacts of the development upon local services. This meets Policy CSP11.

## Environmental Statement

7.42 On 3 July 2023, the applicant received the Council’s Screening Opinion, stating that the proposed development is considered to be EIA development, with reasons relating to biodiversity and landscape/visual effects. While the applicant considers that EIA is not required to be undertaken in respect of the proposed development (with a pending request for an EIA Screening Direction from the Secretary of State), this application is therefore accompanied by an Environmental Statement (‘ES’) which includes an assessment of the environmental effects from the proposed scheme on landscape and views, and ecology and biodiversity. The non-technical summary of the ES (Volume 3) concludes that overall significant adverse environmental effects would not be likely as a result of the proposed development, with the main individual impact of note being the localised impact upon landscape within the site itself as a result of the development.

## 8.0 Planning Obligations and Conditions

- 8.1 Government guidance on planning conditions and obligations is set out in the NPPF (2023) and PPG.
- 8.2 The NPPF (Paragraph 55) states that LPAs “*should consider whether otherwise unacceptable development could be made acceptable through the use of conditions or planning obligations. Planning obligations should only be used where it is not possible to address unacceptable impacts through a planning condition*”.
- 8.3 The NPPF also notes that planning conditions should be kept to a minimum and only imposed where they are “*necessary, relevant to planning and to the development to be permitted, enforceable, precise and reasonable in all other respects*” (Paragraph 56). PPG notes that they should be tailored to tackle specific problems, rather than standardised or used to impose broad unnecessary controls.
- 8.4 In relation to obligations, Paragraph 57 of the NPPF states that these should only be sought where they are:
- a *Necessary to make the development acceptable in planning terms;*
  - b *Directly relevant to the development; and*
  - c *Fairly and reasonably related in scale and kind to the development.*
- 8.5 The scale of the application will give rise to certain infrastructure requirements, the vast majority of which will be met through the detailed design and delivery of the proposal. However, some requirements will need to be secured through planning obligations and conditions, the scope of which will be discussed during the determination of the planning application, in light of the accompanying material and the outcome of the statutory consultation on the planning application.
- 8.6 It is also noted that TDC have a Community Infrastructure Levy (CIL) Charging Schedule adopted in July 2014, with a rate of £120 per sqm for all residential development (subject to indexation). The proposed development is liable for CIL.

### Draft S106 Heads of Terms

- 8.7 At this stage, it is envisaged that the proposed development would make provision for, or a contribution towards, the following as part of a s106 agreement:
- 40% affordable housing provision;
  - Travel Plan monitoring fee;
  - Open space/play area provision;
  - Car club space;
  - Custom build units; and
  - Transport contribution towards the provision of a zebra crossing and improvements to the bus stop adjacent (including a bus shelter) to St Mary’s CofE Primary School (as set out on the proposed access arrangements drawing).

## 9.0 Summary and Conclusions

- 9.1 This Planning Statement provides an assessment of the development at Land to the northeast of Chichele Road in relation to national, strategic and local planning policy and guidance. This Statement has demonstrated that the proposed development will deliver a wide range of planning, housing, economic, social and environmental benefits. These are summarised below:
- 1 The delivery of 116 new homes to meet a range of housing needs including the delivery of 40% of the scheme as affordable housing. In the context of Tandridge's acute affordable housing needs, substantial shortfall in housing land supply and significant environmental constraints, this represents a substantial benefit.
  - 2 The site would deliver housing in a highly accessible and key growth location on the edge of the built-up area of Oxted, which promotes sustainable patterns of development and accords with the Council's spatial strategy for the District.
  - 3 The scheme would deliver new and enhanced public open space, including amenity space, an improved pedestrian and cycle network, a large equipped area of play and other natural landscaping areas, all of which provide increased opportunities for formal and informal recreation.
  - 4 The site would set a new benchmark for how sustainable construction can be achieved within Tandridge, with the proposed development achieving 70% carbon reductions over building regs, utilising renewable energy sources and adopting a range of sustainable design standards. All houses would be timber frame, reducing embodied carbon.
  - 5 Compensatory improvements to the Green Belt would be supported, including opening up formal access and routes through currently private and inaccessible Green Belt land and potential improvements to the quality of connections to the PRoW network and surrounding environment.
  - 6 The provision of new housing will make an important contribution to the local economy and community, through the creation of new jobs, construction investment, additional economic output, and significant increases in local spending.
  - 7 The site would further support the community, health, and wellbeing of new and existing residents in the local area by increasing the choice and availability of affordable housing, providing significant private amenity space and high-quality, useable open space and supporting employment needs in the District.
  - 8 Biodiversity enhancement (and net gains) would be achieved through the development, supporting the local ecological network.
  - 9 Financial contributions towards the provision or improvement of infrastructure and community facilities in the District, as deemed appropriate by the Council.
- 9.2 The proposed development embodies the principles of sustainable development promoted throughout the NPPF and it also complies with relevant objectives and requirements of the statutory Development Plan, as well as relevant emerging policy.

- 9.3 In the Green Belt context, it is considered that limited planning harm arises from the proposed development and that this harm is more than outweighed by the wider public benefit that the scheme would generate. There is a clear need to release Green Belt land to meet needs in Tandridge, and this Statement has determined that Very Special Circumstances exist for the site. As such, the site accords with NPPF Paragraph 148 and the Statutory Development Plan at TLP Part 2 Policy DP10. We consider there are no other material considerations which would support a refusal of permission and conclude that full planning permission should therefore be granted.



## **Appendix 1**

# **Five-Year Housing Land Supply Assessment**

## Tandridge: Five-Year Housing Land Supply Assessment

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### Introduction

- A1.1 This technical note provides an assessment on Five-Year Housing Land Supply ('5YHLS') matters in support of this application for residential development at Chichele Road, Oxted ('the site'), which lies within the administrative area of Tandridge District Council ('TDC').
- A1.2 Paragraph 74 of the National Planning Policy Framework ('NPPF') (2023) requires Local Planning Authorities ('LPAs') to identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing. NPPF paragraph 11(d) sets out that where an LPA cannot demonstrate a 5YHLS, the policies most important for determining applications involving the provision of housing are considered out of date. This means granting permission unless policies in the NPPF that protect areas of particular importance – for example, Green Belt – provide a clear reason for refusing the development (Paragraph 11di and Footnote 7).
- A1.3 TDC acknowledges that it cannot demonstrate a 5YHLS, and as such immediate housing needs will go unmet. The purpose of this note – supporting the Planning Statement – is to review the Council's stated position, consider whether that position is robust, and consider the way that the housing land supply shortfall should be addressed and applied in the overall determination of the application. In particular, it provides one factor (among others) supporting whether 'Very Special Circumstances' ('VSC') exist in accordance with Paragraph 147 of the NPPF, given the site falls within the Green Belt.

### TDC's Current 5YHLS Position (2022)

- A1.4 The Council's latest 5YHLS position is set out in the Authority Monitoring Report ('the AMR') published in November 2022. The **base date of the assessment is the 1<sup>st</sup> of April 2022**, and it covers the five-year period to 31<sup>st</sup> of March 2027.
- A1.5 The AMR provides several 5YHLS positions based on different housing requirement scenarios and housing supply figures, as well as variations based on the application of a 5% or 20% buffer (Pages 31-32, Tables 11-14 of the AMR). The different positions range from 1.57-years to 7.93-years; however Paragraph 9.30 of the AMR confirms that **the only 5YHLS position which accords with current policy and guidance is 1.57-years**.
- A1.6 This is shown in Table 9.1 below, and is based on the Council's local housing need as assessed using the Government's standard methodology, and a supply of sites that does not include any emerging Local Plan site allocations (which are not yet considered to be 'deliverable' and are very unlikely to be in the short-term, given the likely imminent withdrawal of the emerging plan, as set out in Section 4 of the Planning Statement to which this note is appended). None of the other positions presented within the AMR have merit or are relevant for decision-taking at the current time.
- A1.7 The Council's AMR acknowledges that the Council cannot, therefore, demonstrate a 5YHLS with a **significant shortfall of 2,638 homes (a shortfall of 3.43 years' worth of supply)** over the next five years.

Table 9.1 – Tandridge District Council's Stated 5YHLS Position (2022-2027)

|   | TDC's Stated 5YHLS Position |
|---|-----------------------------|
| 1. Annual requirement (Standard Method) | 642 homes                   |
| 2. Buffer                               | 20%                         |
| 3. Five-Year Requirement                | 3,850 homes                 |
| 4. Total Supply                         | 1,212 homes                 |
| <b>Supply (Years)</b>                   | <b>1.57 years</b>           |
| <b>Shortfall / Surplus</b>              | <b>-2,638 homes</b>         |

Source: Table 12, Tandridge District Council AMR (November 2022)

## Review of TDC's Stated Position

### Housing Requirement

- A1.8 For the purposes of calculating the 5YHLS, the standard methodology local housing need figure should be used as the housing requirement, given that the latest adopted plan was adopted more than five years ago (NPPF Paragraph 74).
- A1.9 The minimum annual local housing need figure for TDC, using the base date of 1<sup>st</sup> April 2022, is **642 homes per year** (as correctly set out on Page 173 of the AMR). It is noted that since the publication of TDC's stated position, the standard methodology local housing need figure – with a 1<sup>st</sup> April 2023 base date and using the latest 2022 median affordability ratio of 14.97 – for TDC is currently 639 homes per year (a marginal difference).

### Buffer and Five-Year Requirement

- A1.10 The **latest Housing Delivery Test (HDT) (2021) measurement for Tandridge was 38%**, with just 634 total net homes delivered against the total 1,672 homes required over the three-year monitoring period.
- A1.11 In accordance with current national policy (NPPF Paragraph 74), an additional 20% buffer should therefore be applied to the housing requirement. This increases the **total five-year housing requirement** from 3,210 homes (642 homes per year) to **3,852 homes**. The appropriate five-year housing requirement for the applicable period from 1<sup>st</sup> April 2022 to 31<sup>st</sup> March 2027 is therefore 3,852 homes. (This is an additional two homes to that stated by TDC, which appears to be a rounding error on the part of the Council).
- A1.12 An updated HDT measurement is yet to be published; the Government's recent consultation on reforms to national planning policy<sup>19</sup> (consultation document, Chapter 4, Para 23) sets out that Government still intends to publish the 2022 results but that, given the proposed changes on the workings of the HDT, they will take a decision on the approach to the test in due course, once consultation responses have been analysed. Notwithstanding, with reference to the AMR (2022) (Tables 1 and 8), just 238 net homes were completed in Tandridge for the 2021-22 period. This suggests delivery will continue to fall significantly short of the housing requirement, resulting in a continued need to apply a 20% buffer.

<sup>19</sup> Levelling-up and Regeneration Bill: reforms to national planning policy (December 2022)

## Housing Supply

- A1.13 For the purposes of assessing the Council's 5YHLS supply, regard has been had to the definition of 'deliverable' in Annex 2 of the NPPF (Page 66), further guidance set out in Planning Practice Guidance (PPG) on Housing Supply and Delivery and a large body of precedent in Inspector and Secretary of State decisions. Our interpretation of the latest policy and guidance on this matter is as follows:
- 'Category A' sites are those listed in the NPPF definition of 'deliverable' and are sites that are considered to be deliverable 'in principle'. This includes commenced sites, sites with detailed planning permission, and sites with outline planning permission for minor development (i.e. fewer than 10 homes). It is only when these sites expire or where 'clear evidence' is presented that these sites will not deliver within the five-year period that they should not be considered deliverable.
  - 'Category B' sites are those which do not have a detailed permission (including those types of sites not specifically listed in the definition). This includes, but is not limited to, sites with outline planning permission for major development, sites with permission in principle, a resolution to grant subject to S106, adopted Local Plan allocations and sites identified on a brownfield land register. These sites should only be considered 'deliverable' where an LPA has published 'clear evidence' that completions will begin on site within five-years.
- A1.14 Determining what forms 'clear evidence' is a matter of planning judgement, however the below points are considered to be of importance:
- 1 Deliverability is determined on the content and value of the evidence prepared, not simply the fact that evidence itself has been provided.
  - 2 The type and form of 'clear evidence' for Category B sites will vary depending on the circumstances of the site (e.g. its size or how quickly it is expected to deliver).
  - 3 LPAs should undertake a critical analysis of any evidence gathered from developers (e.g. site proforma returns).
- A1.15 The Council's stated supply within the applicable five-year period (under the scenario that does not include emerging Local Plan allocations) totals 1,212 homes, as summarised in the table below. This comprises 1,052 homes from specific sites, plus 160 homes from windfall allowances (at a delivery rate of 32 homes per year).

Table 9.2 – TDC's Housing Supply – Deliverable Sites (2022 – 2027)

| Source of Supply | Delivery |         |         |         |         | Total        |
|------------------|----------|---------|---------|---------|---------|--------------|
|                  | 2022/23  | 2023/24 | 2024/25 | 2025/26 | 2026/27 |              |
| Permissions      | 561      | 359     | 132     | 0       | 0       | 1,052        |
| Windfall         | 32       | 32      | 32      | 32      | 32      | 160          |
| <b>Total</b>     | 593      | 391     | 164     | 32      | 32      | <b>1,212</b> |

Source: Table 9, Tandridge District Council AMR (November 2022)

- A1.16 TDC has published a 'Residential Outstanding Capacity' table at Appendix 4 of the AMR (Page 48), which provides further detail on the outstanding permissions totalling 1,052 homes within their stated supply. This includes relevant information such as whether development has commenced, the description of development, and net outstanding

capacity. In the context of the latest policy and guidance as set out above on deliverability, the ‘permissions’ supply identified in the Council’s trajectory has been reviewed to determine whether the sites should be considered ‘deliverable’.

- A1.17 Firstly, it is noted that the Council’s position does not publish the projected year-by-year completions for each site. It is therefore not clear on what lead-in times and build rates have been applied to arrive at the Council’s overall supply position, and therefore how reasonable or not it is to assume that all the completions will be achieved within the five-year period.
- A1.18 From a review of the planning status specified by the ‘Residential Outstanding Capacity’ table, most of the supply (1,030 out of 1,052 homes) appears to comprise Category A sites, with 599 homes from sites that have already commenced, 428 homes from sites with detailed planning permission, and 3 homes from sites with outline permission for minor residential development. Of this Category A supply, 470 homes are expected to be delivered on small sites of less than 10 homes (from 203 sites) and 571 homes on large sites of 10+ homes (from 18 sites) – with other sites posing a net reduction (totalling -11 homes). The remaining 22 homes are from two Category B sites with outline permission for major development.

#### *Category A Sites*

- A1.19 As a starting point, Category A sites are presumed to be deliverable. However, from a focused review of those large sites comprising major development (10+ homes), delivery from the following is disputed:
- **Eugene Bann Tennis Centre, South Nutfield (2019/13) (23 homes)** – The site relates to the demolition of an existing tennis centre and erection of a block of 23 flats, allowed on appeal (made by Woolbro Homes) on 21 September 2020. Promotional material (by Kingsbury Stone) subsequently invited offers for the freehold of the site, suggesting that the owner/developer wishes to sell the site, which benefits from planning permission that could be ‘enhanced’. Two discharge of conditions applications by Woolbro Homes were submitted in July 2023; these are as yet undetermined and the application forms for both state that development had not started. On this basis, 23 homes should be removed from the supply as there is clear evidence to suggest that this permission has not been implemented prior to its expiry (21 September 2023).
  - **Clearway Court, 139 to 141 Croydon Road, Caterham (2020/970/NC) (19 homes)** – The site relates to an office to residential conversion approved under permitted development rights in August 2020. However, permission was previously granted in 2017 (2017/1399/NC) for a similar development and never implemented, and there have been various applications since that permission to demolish the office block for a comprehensive residential development, all of which have been refused. This includes an application (2021/872) to extend the office block and create 6 new homes which was refused in August 2021 (and a subsequent appeal dismissed in March 2022) as well as a further application (2023/403) to provide 2 residential units within the existing undercroft, refused in August 2023. An application (2022/1597) was submitted in December 2022 (after the base date) and approved in August 2023 for the erection of a new building to the rear of the site, totalling 9 units. It is apparent that the developer wishes to either redevelop the site or extend it, as opposed to conversion, and the latest

scheme relates to a separate part of the site and was submitted after the base date. On this basis, 19 homes should be removed from the supply as there is clear evidence to suggest that the developer does not intend to implement the current approval.

- **Edgehill, Succombs Hill, Warlingham (2019/1455) (16 homes)** – Full planning permission was allowed on appeal for 16 homes in June 2021. However, a new full application (2022/225) was submitted in February 2022 (prior to the base date) for a revised scheme of 21 flats, which was approved in December 2022, with subsequent discharge of conditions applications also submitted. The application documents stated that the site holds potential for the development of additional units, and that the revised scheme will make the most effective use of the urban site. This provides clear evidence that the applicant intends to implement the latter approved scheme for 21 homes (2022/225). On this basis and to be consistent in approach, 5 homes should be added to the supply. We expect that this will be reflected within updated monitoring data published by TDC in late 2023.
- **Kings Mill, Kings Mill Lane, South Nutfield, Redhill (2021/125/NC) (13 homes)** – The site relates to an office to residential conversion approved under permitted development rights in March 2021. However, a subsequent full planning application (2022/486) to demolish the office building and re-develop the site for 7 houses instead was submitted and validated on 4 April 2022 (after the base date), and approved on 14 July 2022. The Planning Statement for the application states that the former permission presented a ‘fallback position’. On this basis, 6 units should be removed from the supply as this provides evidence that the new permission (for 7 houses instead of 13 apartments) is that which the applicant will implement.
- **Green Hedges, Westerham Road, Limpsfield, Oxted (2021/774) (12 homes)** – This site relates to the demolition of an existing building (1 unit) and erection of a new building containing 12 flats. It has detailed planning permission under the outline application (2020/2170) granted in March 2021 and reserved matters application (2021/774) granted in September 2021. However, a Section 73 application was submitted in January 2022 (prior to the base date) and approved in June 2022, which reduces the total number of units from 13 to 11 (10 net units). Therefore, 2 homes should be removed from the supply on this basis.

#### *Category B Sites*

A1.20

In addition, policy, guidance, and precedent is clear that for Category B sites to be deliverable they must be accompanied by some form of evidence that is sufficiently clear to demonstrate deliverability. However, there is a fundamental shortcoming to the Council’s evidence in this regard; the AMR does not include any site-specific evidence in support of its Category B sites. For example, TDC has not provided any commentary on specific sites and has not published any information provided by relevant developers (e.g. in the form of a proforma or agreed statement). A further 10 homes from the following Category B site should therefore be removed from the supply:

- **5 Queens Park Road, Caterham (2020/1504) (10 homes)** – A reserved matters application (2022/245) was submitted in February 2022. This was refused in September 2022 and an appeal (ref. APP/M3645/W/22/3311144) dealt with by written representations started in March 2023, but has not yet been decided.

### Windfalls

- A1.21 In terms of windfalls, Paragraph 71 of the NPPF sets out the basis on which windfalls should be included as part of supply. It confirms that – as a starting point – a windfall allowance should not be included, and that the test for including a windfall allowance is ‘compelling evidence’.
- A1.22 As set out in Table 9.2 earlier, the Council’s current 5YHLS position concludes that a windfall allowance from small sites of 32 homes per year should be included in the supply, based on an assessment of windfall delivery rates since 2006/07. This approach appears to be reasonable, and this figure was endorsed by the emerging Local Plan Inspector in his preliminary conclusions (ID16, Paragraphs 32 and 39). However, the Council include this allowance across the whole of the five-year period and there is a risk of double counting existing permissioned small sites.
- A1.23 For this assessment, the windfall allowance should only be included in years four and five of the assessment to avoid double counting with existing permissions for small sites that are projected to deliver in the first three years; removing a total of 96 homes from the supply.

### Conclusions

- A1.24 Based on the above, the Council’s evidenced deliverable supply for the 2022-2027 period should be reduced by 151 homes to a total of 1,061 units. On this basis, the Council can only demonstrate a supply of 1.38 years at most, as set out in Table 9.3 below. This is 0.19 years lower than the Council’s published position.
- A1.25 While the Council’s AMR acknowledges that it cannot demonstrate a 5YHLS, these downwards amendments to the supply figure (in accordance with policy and guidance) demonstrates that the actual position is only more acute. Overall, it is considered the shortfall is highly significant; the table below shows that it is equivalent to a severe shortfall of 2,791 homes (3.62 years’ worth of supply). This is further compounded by the fact that there appears little prospect that the housing needs identified by the standard method will be met soon, particularly given the emerging Local Plan (and the proposed site allocations contained therein) is likely to be found unsound and/or withdrawn in the near future.

Table 9.3 – Concluded 5YHLS Position (2022 – 2027)

|                            | TDC 5YHLS Position (2022 AMR) | Lichfields Assessment                |
|----------------------------|-------------------------------|--------------------------------------|
| Annual requirement         | 642 homes                     | 642 homes                            |
| Buffer                     | 20%                           | 20%                                  |
| Five-Year Requirement      | 3,850 homes                   | 3,852 homes<br>(+2)                  |
| Total Supply               | 1,212 homes                   | 1,061 homes<br>(-151)                |
| <b>Supply (Years)</b>      | <b>1.57 years</b>             | <b>1.38 years</b><br><b>(-0.19)</b>  |
| <b>Shortfall / Surplus</b> | <b>-2,638 homes</b>           | <b>-2,791 homes</b><br><b>(-153)</b> |

Source: Tandridge District Council AMR (2022); Lichfields Analysis

- A1.26 Whilst we note that previously proposed and consulted upon changes to national planning policy contained within the NPPF would hypothetically change the approach to calculating 5YHLS, this is not currently considered to change the approach that should be applied at the current point and to this application, because:
- 1 The proposals are not policy, there has been substantial response to the consultation and Government has delayed any publication of any changes. There is no certainty that any of the potential changes mooted will be brought through, and very limited regard can be given to them at the current point; and
  - 2 Even then, the proposed changes would not substantively improve Tandridge's 5YHLS position, namely:
    - a Even under an approach whereby the need to apply a buffer within the 5YHLS calculation is entirely removed (resulting in a reduced total five-year requirement of 3,210 homes) the 5YHLS position in Tandridge remains acute, with a hypothetical supply of between 1.65 years (Lichfields position) and 1.89 years (TDC position).
    - b The proposal that for two years from the date of NPPF publication, where emerging local plans have been submitted for examination or where they have been subject to a Regulation 18 or 19 consultation, and the housing requirement in the existing plan is more than five years old (as in TDC), local planning authorities would only need to demonstrate a four-year housing land supply would not improve matters – as above, a 1.65 to 1.89 years' supply would still fall significantly short of the four year benchmark, notwithstanding the emerging local plan is likely to be withdrawn or found unsound imminently.
    - c Based on an initial review, taking oversupply from earlier in a plan period into account within the 5YHLS calculation to offset against the five-year requirement would notionally reduce the deficit, but the shortfall would still be more than the oversupply. The consultation material is also not clear nor prescriptive at the current point about how this could or should be done, with suggested changes pointing toward new planning guidance which is yet to be drafted/proposed.
- A1.27 In this context, the proposed changes – at least in the way currently consulted upon – would not appear to substantially improve the prospects of TDC being able to demonstrate a 5YHLS.



## **Appendix 2**

### **Benefits Statement**

## Benefits Statement

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### Introduction

- A2.1 This technical note provides an assessment of the economic and social benefits of the proposed residential development at Chichele Road, Oxted ('the site'), which lies within the administrative area of Tandridge District Council ('TDC'). The proposed scheme comprises 116 new homes including 40% affordable housing provision alongside new public open space and associated infrastructure.
- A2.2 Paragraph 11d of the National Planning Policy Framework (NPPF, 2023) sets out that the policies which are most important for determining housing applications are out of date in situations where the local planning authority cannot demonstrate a five-year supply of deliverable housing land, or where the housing delivery test indicates the delivery of housing was below the housing requirement over the previous three years; both circumstances which apply in Tandridge. In such circumstances permission should be granted unless policies of protection within the Framework (including Green Belt) provides a clear reason for refusal, or any adverse impacts of granting permission would significantly and demonstrably outweigh **the benefits** of doing so ('the tilted balance').
- A2.3 The scheme will bring a range of benefits to the local community, the District, and the wider area. Beyond the significant housing benefits detailed within the Planning Statement to which this note is appended, there are substantial economic and social and wellbeing benefits accruing from the development, which are considered important factors that support and contribute to the Very Special Circumstances ('VSC') case for the site.

### Economic Benefits

- A2.4 The proposed residential-led scheme represents an important opportunity for investment within the settlement of Oxted, generating a range of economic impacts that will make a significant contribution to the local economy and community. This includes quantifiable impacts as well as a range of less tangible benefits, both during the construction phase and on an ongoing basis, associated with the occupation of the new housing development. The benefits below draw on the [Evaluate](#) methodology developed by Lichfields, which provides an analytical framework for assessing economic impacts arising from new development.

### Construction Benefits

- A2.5 The construction phase of the proposed development will lead to both direct and indirect potential economic impacts. Key impacts relate to new employment opportunities and additional economic output that will be generated over the duration of the construction period, which is currently anticipated to last just over two years<sup>20</sup>.
- A2.6 Based on the nature of the proposed scheme and housing mix, the **construction cost** of the residential development is estimated – using BCIS average £/sqm costs for the mix of new build housing proposed – to be around **£16.5 million**. This represents a significant

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<sup>20</sup> Construction period (c.2.1 years) is based on [Start to Finish \(2020\)](#) and an assumed average annual build out rate of 55dpa.

scale of capital investment, which in turn will generate employment and economic output during construction.

- A2.7 The number of **direct construction jobs** supported by the proposed development over the course of the construction phase is projected to be **119** direct Full-Time Equivalent (FTE) jobs annually. As housing construction is made up of many discrete elements of work undertaken by specialists (such as bricklaying, carpentry, plumbing, electrics, etc.), the number of workers on-site will fluctuate during different periods of the construction phase.
- A2.8 The construction phase of the development will also contribute to local economic output, measured by Gross Value Added (GVA) which represents the additional value that is added through economic activity. Based on Experian data (July 2023), the construction sector generates an average GVA per FTE job of £93,871 per annum in the South East. Applying this to the direct employment impact of the proposed scheme, it is estimated that the construction activity could generate **an additional £11.2 million of direct GVA for each year** of construction.
- A2.9 Construction also involves acquisitions from several suppliers, who in turn purchase from their suppliers through the supply chain. The relationship between the initial direct spending and total economic effects is known as the ‘multiplier effect’, which demonstrates that an initial investment can have much greater indirect effects as this spending is diffused through the economy. Local businesses would therefore be expected to benefit to some extent from a temporary increase in expenditure from the direct and indirect employment effects of the construction phase. Although only a proportion of these benefits would be felt in the local area, it would be expected that the local economy would gain a sizeable temporary boost from the wage spending of workers in shops, pubs, and other services and facilities. Such effects are typically referred to as ‘induced effects.’
- A2.10 In addition to the 119 direct construction FTE jobs per annum generated by the proposed scheme, it is estimated that **144** FTE jobs annually would arise as an **indirect result** of the construction period, supported in sectors across the UK economy. This equates to a total of **263 FTE jobs per annum**.
- A2.11 Further, the construction activity of the proposed scheme is estimated to produce an additional **£13.6 million of indirect and induced GVA for each year** of construction. This results in a total of around £24.8 million direct, indirect, and induced GVA each year, all of which will be retained locally.

### **Resident Expenditure**

- A2.12 For residential developments, once completed and occupation has begun, one of the key economic impacts is the increase in local spending that would be generated by new households living in the area. The scale of this impact is determined by the expenditure patterns of existing residents, and the extent to which residents of new homes move into the area from elsewhere.
- A2.13 Research suggests that the average homeowner spends approximately £5,500 to make their house ‘feel like home’<sup>21</sup>. This money is normally spent on furnishing and decorating a

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<sup>21</sup> One Poll survey carried out on behalf of Barratt Homes (2014)

property, generating a range of economic benefits for the local economy, including by supporting indirect and induced jobs within local businesses.

- A2.14 By applying this average level of one-off spending on household products and services to the 70 new market homes that are proposed, it is estimated that the potential new residents could generate approximately **£385,000 of first occupation expenditure**. This injection of resident spending within the local economy would help to sustain local businesses and could support additional FTE jobs in the local area, thereby increasing further employment opportunities.
- A2.15 Analysis of Output Area Classifications (OAC) indicates that housing areas within the area surrounding the proposed development site are largely dominated by households in the ‘Suburbanites’ socio-economic classification group<sup>22</sup>. The population of this group is more likely to comprise older people and families with school-age children, who live in private housing on the outskirts of urban areas and work in the information and communication, financial, public administration, and education related sectors. It is anticipated that the new households accommodated within the proposed development would broadly be within the same type of household group.
- A2.16 The ONS Family Spending Survey provides data on household spending by socio-economic classification nationwide<sup>23</sup>. This data indicates UK average spending levels of c.£585 per week for each household, with a regional weekly average for the South East of c.£699. Comparing household spending averages in the region and nationally allows an estimation of the regional average household spending in the South East by those households falling in the ‘Suburbanites’ classification, which equates to £556 per week for market homes and £452 for affordable homes. Based on these assumptions, it is estimated that residents of the proposed development could generate **a total gross expenditure figure of over £3.7 million per annum**.
- A2.17 Only a proportion of the gross expenditure by new residents of the proposed development will be retained within the area. Based on retention rates set out in Tandridge District Council’s (TDC) Retail and Leisure Study<sup>24</sup>, it is estimated that around **57% of expenditure** on comparison goods, convenience goods and food and beverage **will be retained within the wider Oxted area** (i.e. where the site is located). This takes account of existing spending patterns in the local area, which show that a proportion of retail and leisure expenditure leaks to other destinations outside of the Tandridge District, including Croydon, Greater London and Reigate and Banstead.
- A2.18 Taking this into account, it is estimated that the **total net additional spending generated by the new residents equates to £1.6 million per annum**. This additional spending will support the vitality and viability of local businesses and could encourage other firms to move to the local market, as well as supporting the function of town centres. As this additional expenditure is likely to go towards a wider range of products and services than the first-occupation expenditure, it is estimated that this could **support a further 13 FTE jobs** across retail, leisure, hospitality, catering, and other

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<sup>22</sup> ONS, 2011 Area Classification for Output Areas

<sup>23</sup> ONS, Family spending in the UK (2021 edition)

<sup>24</sup> Tandridge Retail and Leisure Study Update Final Report (2018): Expenditure retention rate of 56.8% is based on the average rates for convenience goods (77.6%), comparison goods (28.1%) and food and beverage (64.7%) within the Oxted area/Zone 1.

service sectors in the local area. When combined with first occupation expenditure, the total number of jobs supported by new residential expenditure in the local area is 14 FTE jobs.

### **Fiscal Benefits**

- A2.19 In addition to construction benefits and resident expenditure, there are other fiscal benefits delivered by the proposed development that will accrue to TDC and help fund the delivery of new social and community infrastructure and services.
- A2.20 Firstly, the proposed development would generate an increase in council tax receipts, providing an additional boost to the revenue base of TDC. Taking into account the levels of council tax levied by the local authority in the 2023/24 financial year<sup>25</sup> and the proposed housing mix of the proposed scheme, it is estimated that the development could generate around **£314,000 per annum in additional council tax payments** in perpetuity.
- A2.21 It is important to note that the proposed development would also provide funds for TDC through planning obligations and financial contributions towards infrastructure needs. The Council has adopted a Community Infrastructure Levy (CIL) which the scheme would be subject to, with monies collected via the levy supporting the growth of the District including the provision or improvement of schools, GP surgeries and transportation. Using the Council's CIL rate indexed to 2023, the proposed development could contribute up to **c.£2.1 million to this levy**<sup>26</sup>.

### **Economic Competitiveness and Wider Impacts**

- A2.22 Research has focused on the wider role that new housing development can play in supporting economic growth, alongside the need to ensure greater value for money in public expenditure terms. The role of housing in the economy is complex, however, new housing delivery has the potential to generate a range of improved economic outcomes.
- A2.23 Housebuilding is a relatively labour-intensive activity and generates a high number of jobs per £1 of investment made. As set out above, this new activity would drive up productivity, support existing jobs and make new job opportunities. Strong local supply chain for materials also means a far greater share of spending remains in the UK, rather than being channelled into imports as with many other sectors. Housebuilding is therefore recognised in national policy ('Planning for the future' (2020) and 'Fixing our broken housing market' (2017) White Papers and the NPPF) as having a major role in stimulating economic growth, supporting significant levels of employment and ensuring the long-term competitiveness of the UK economy.
- A2.24 In addition, the proposed development offers an opportunity to provide buildings which fit cohesively with the surrounding urban area, enhancing the central housing offer, and enriching the quality of the local urban environment. The enhanced environment, including the proposed new open space, will improve opportunities for social interaction between people of different communities, fostering social inclusion, community development and business interaction. This can have indirect economic benefits by increasing productivity

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<sup>25</sup> Council Tax bands in Tandridge 2023/24: Figures based on those for Oxted Parish.

<sup>26</sup> Based on a total floorspace figure of 11,811.41 sqm and the 2023 TDC CIL rate of £178.24 for all residential development. Note: a social housing relief may apply to the affordable homes.

(e.g. fewer ‘sick days’) as well as acting as a preventative measure on demand for health and social services that can impact on public budgets.

- A2.25 The potential economic impacts of the proposed development in Tandridge also align well with a range of national, sub-regional and local policy objectives. This includes:
- NPPF (2023) objectives to support economic growth and productivity, considering local business needs and wider opportunities for development, and to provide sufficient homes to meet at least the minimum identified need.
  - The Levelling-up and Regeneration Bill reforms to national planning policy consultation (2022) and proposed changes for planning for housing, with key aims to secure more high-quality homes in the right places to address affordability pressures and locate more homes in sustainable urban locations where development can help to reduce the need to travel (thereby supporting sustainable patterns of development overall) and contribute to productivity, regeneration and levelling up.
  - Tandridge Emerging Local Plan (2019) objectives and policies to deliver new homes especially a greater variety of homes in terms of size, type and tenure to meet identified needs (particularly affordable housing needs), and to strengthen and diversify the economy, providing opportunities for residents to work locally.
  - Tandridge Housing Strategy (2019-2023) and the key strategic objective to build housing of the right tenure and type close to local amenities with good public transport links wherever possible.

### **Summary**

- A2.26 The proposed residential-led scheme would increase the supply of market and affordable homes which will help meet projected increases in population and enhance economic prosperity by creating employment opportunities for local people, thereby stimulating further growth across the area. It represents an important opportunity for investment within the settlement of Oxted and the provision of new housing will generate a range of economic impacts that will make a significant contribution to the local community.

### **Social Value and Wellbeing Benefits**

- A2.27 Further to the economic benefits identified above, the proposed development provides a strong opportunity to deliver significant beneficial socio-economic impacts and a scheme that is aligned with positive community, health, and wellbeing outcomes for different groups of society. This draws on the [Social Value](#) toolkit developed by Lichfields, which highlights the importance of assessing the social contribution of new development projects. In 2019, the Cabinet Office defined Social Value<sup>27</sup> as:

*“the wider financial and non-financial impacts of projects and programmes, including the wellbeing of individuals and communities, social capital and the environment”.*

### **Addressing Acute Housing Needs**

- A2.28 The predominately rural geography of the Tandridge District presents particular challenges for some of its residents. The Council’s Homelessness Prevention Strategy (2019 – 2023)

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<sup>27</sup> Cabinet Office: Social Value in Government Procurement (2019)

acknowledges that one of these issues is that housing in the District '*is very expensive and there is a known acute shortage of affordable housing*'. It shows that the numbers of households registered as being in urgent need on the Housing Register over the period 2013/14 to 2017/18 were significantly higher than the number of affordable homes coming forward each year, and that levels of homelessness in the District have continued to rise over the same period.

- A2.29 The Strategy also states that the District has one of the highest percentages of income deprivation across Surrey and one of the lowest average weekly earnings; research commissioned by the Council determined that an annual income of c.£71,000 a year is required to purchase entry level housing in the District, yet 75% of households in the District earn less than this figure. This suggests that only one in four households in the District can afford to buy their own home, and that the affordability of housing and promotion of wellbeing is very challenging for many residents.
- A2.30 A constrained housing supply, and amongst other things, continued affordability pressures could have a significant impact on the ability of residents to buy housing locally, particularly those with lower-paid jobs. This could force such workers to move further afield, increasing commuting and reducing local labour supply, thereby limiting the prospects for businesses to create or maintain jobs in the area.
- A2.31 The proposed scheme includes the provision of 46 high-quality affordable homes including first homes, affordable rent, and shared ownership tenures. This would have a direct positive impact on the choice and availability of lower-cost accommodation for residents in the District, and in doing so improve livelihoods and contribute to alleviating local housing affordability issues. The delivery of 46 affordable homes would reduce the number of homeless households currently accommodated in temporary accommodation by the Council, thereby generating potential savings to the Council of around £357,000<sup>28</sup>.

### **Private Amenity Space and Access to Open Space**

- A2.32 Three-quarters (74%) of homes (every house) in the proposed scheme would have access to a private garden, and the remaining homes (apartments) have access to private amenity space. It is widely known that the use of open space and gardens has a direct positive impact on physical and emotional wellbeing.
- A2.33 Analysis by the London School of Economics<sup>29</sup> showed that there is a positive health and quality of life benefit from access to a private garden; it is estimated that use of your own garden weekly or more had a significant quality of life benefit, equating to an annual benefit per person of between £171 and £575 per annum. This is based on converting a measure of people's quality of life into monetary terms (and to society rather than the individual) based primarily on health cost savings. Assuming 2.3 persons per household<sup>30</sup> and using a mid-point estimate of £373 per person per annum, this translates into a notional societal benefit from garden space of £99,500.

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<sup>28</sup> Based on finding that moving each family in temporary accommodation and into social rented accommodation saves about £7,760 per year – Chartered Institute of Housing and Centre for Homelessness Impact Report (October 2021) Housing for people on low incomes: how do we make the best use of government subsidies in England?

<sup>29</sup> Economic Analysis of Cultural Services, London School of Economics (2010)

<sup>30</sup> Represents the figure used in the latest TDC Open Space Study (2017) based on 2014 based household projections

- A2.34 In addition, the proposed scheme includes the provision of around 1.2 ha of open space. This includes the provision of a high-quality equipped play area, which provides valued recreational space and a safe environment for children to play. The amenity green space at the entrance and in the centre of the site, alongside an additional smaller play area to the eastern boundary, also provides an informal environment complementing existing green infrastructure and improving local access to open space.
- A2.35 The proposed play area would represent a significant improvement in terms of the quality of equipped play areas in the local area, consisting of six wooden items of formal play (e.g. bird nest swing, slide structure, somersault bars, climbing structure and two hammock swings) and items of informal play including climbing boulders. This will be provided in a suitable location within the centre of the site, with smaller Local Area of Play comprising natural play features located to the east. This will represent an important local benefit to the communities in the north of Oxted and Limpsfield.
- A2.36 The average distance to the nearest park, public garden or playing field (which may be private) in Tandridge is 426 metres, compared to a national average of 385 metres<sup>31</sup>. Creating new public open space will increase the availability of high-quality, useable recreational space for new and existing residents in the local area – leading to associated improvements in physical and mental wellbeing, whilst also supporting the wellbeing of local residents and encouraging social inclusion and community participation for a range of people. This is exemplified by analysis of Birmingham’s Be Active programme, which suggests that up to £23 is recouped for every £1 spent on sports facilities/open space in terms of better quality of life, reduced NHS use and other productivity gains associated with improved physical activity<sup>32</sup>.

### **Addressing Employment Needs**

- A2.37 The provision of additional jobs within Tandridge comprising both temporary construction jobs and supported supply chain jobs will help to support the resilience of the local economy. In 2021, the largest broad industrial sectors in terms of employment within the District were health (15.2%), construction (12.1%) and education (10.6%) and retail (10.6%)<sup>33</sup>. As one of the largest industries for employment in Tandridge, providing a significant number of additional construction jobs will therefore support this employment need by creating new jobs for local people as well as generating opportunities for the upskilling of young people, such as through apprenticeships during the build period. In turn, this will help the local high street and independent traders through increased local spending.

### **Summary**

- A2.38 The proposed scheme provides a unique opportunity to make an important socio-economic contribution to the area which goes beyond the wider financial benefits, including the health and wellbeing of individuals and communities. In turn, these positive impacts will support local economic growth.

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<sup>31</sup> Access to public parks and playing fields, ONS (2020)

<sup>32</sup> Cost-benefit analysis and social impact bond feasibility analysis: Birmingham Be Active Scheme (2011)

<sup>33</sup> Business Register and Employment Survey, ONS (2021)



## Conclusions and Summary

- A2.39 This note has demonstrated that the proposed development will generate a range of quantifiable economic impacts that will make a significant contribution to both the local economy and community. The proposal will also generate important social benefits, such as improved livelihoods by addressing local housing needs and better quality of life through the provision of private amenity space and improved local access to play and open space.
- A2.40 The quantifiable impacts of the proposed development include:
- 1 Supporting approximately 119 direct FTE construction jobs during each year of construction at a range of skill levels;
  - 2 Supporting a further 144 jobs in services and other businesses from the wage spending of construction works and supplier outsourcing per annum;
  - 3 Generating £11.2 million direct GVA and £13.6 million indirect and induced GVA per annum from the construction phase of the proposed development, totalling £24.8 million;
  - 4 Increased spending, delivering a significant boost to the local economy by generating ‘first occupation expenditure’ of £385,000 on goods to make each unit ‘feel like a home’;
  - 5 Generating £3.7 million of expenditure per year in shops and services, of which £1.6 million each year is estimated to be retained within the Oxted local area and will support a total of 14 additional FTE jobs in the local area; and
  - 6 Improved public finances, delivering £314,000 of council tax receipts per annum as well as fiscal contributions towards local infrastructure.
- A2.41 The social value and wellbeing impacts of the proposed development include:
- 1 Improved livelihoods by addressing local housing needs – providing much needed affordable homes in a sustainable location will help to alleviate acute affordable housing pressures and reduce homelessness;
  - 2 Promoting physical and mental wellbeing through the provision of private amenity space, equal to a societal benefit of £99,500 (based primarily on health cost savings);
  - 3 Improved quality of life by providing new open space including equipped play provision, improving local access to valued open space; and
  - 4 Supporting local jobs, particularly in the construction sector, to address unemployment and generate opportunities for upskilling.
- A2.42 In a Green Belt context, the importance of such benefits is clearly established in recent appeal decisions elsewhere<sup>34</sup> on VSC, which show that great importance should be placed on these benefits in decision-taking (many of which are common to the scheme at Chichele Road), and that they can, and often will, in combination amount to VSC. It is evident that both local and wider economic and social benefits are hugely important in justifying what

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<sup>34</sup> North of Boroughbridge Road, South Millfield Lane, York (APP/C2741/W/19/3227359) (October 2019); Footzie Social Club, Station Approach, Lower Sydenham (APP/G5180/W/20/3257010) (March 2021); Roundhouse Farm, Colney Heath, St Albans (APP/B1930/W/20/3265925) (June 2021); Land West of Limpsfield Road, Warlingham, Tandridge (APP/M3645/W/22/3309334) (April 2023).

would, by definition, be inappropriate development and that they can – and should – carry substantial weight in support of development proposals. The scheme, including the provision of significant and high-quality public open space and an equipped play area as well as much-needed new housing, would also make a notable contribution to the Council's priorities and key economic and planning objectives for the District.

## **Appendix 3 Affordable Housing Statement**

## Affordable Housing Statement

### Number, mix, tenure and floorspace

A3.1 In total, 46 affordable homes will be provided, with 23 (50%) being affordable rent, 12 (26%) First Homes and 11 (24%) shared ownership. The following schedule sets out the mix, tenure and floorspace of those homes.

Figure 9.4 – Affordable Housing Provision of the Proposed Development

| House type    | Description     | Affordable Rent     | Shared Ownership    | First Homes         | Total units          | Unit Sq/Ft | Total Sq/Ft   |
|---------------|-----------------|---------------------|---------------------|---------------------|----------------------|------------|---------------|
| Block A 1A    | 1 Bedroom Flat  | 0                   | 0                   | 6                   | 6                    | 543        | 3,255         |
| Block D 1A    | 1 Bedroom Flat  | 0                   | 0                   | 6                   | 6                    | 543        | 3,255         |
| Block B 1BF   | 1 Bedroom Flat  | 3                   | 0                   | 0                   | 3                    | 550        | 1,650         |
| Block C 1BF   | 1 Bedroom Flat  | 3                   | 0                   | 0                   | 3                    | 550        | 1,650         |
| Block B 2BF.1 | 2 Bedroom Flat  | 3                   | 0                   | 0                   | 3                    | 763        | 2,290         |
| Block B 2BF.2 | 2 Bedroom Flat  | 3                   | 0                   | 0                   | 3                    | 766        | 2,299         |
| Block C 2BF.1 | 2 Bedroom Flat  | 3                   | 0                   | 0                   | 3                    | 763        | 2,290         |
| Block C 2BF.2 | 2 Bedroom Flat  | 3                   | 0                   | 0                   | 3                    | 766        | 2,299         |
| Bellflower    | 2 Bedroom House | 1                   | 6                   | 0                   | 7                    | 864        | 6,048         |
| Dandelion     | 3 Bedroom House | 0                   | 1                   | 0                   | 1                    | 1,070      | 1,070         |
| Erica         | 3 Bedroom House | 4                   | 4                   | 0                   | 8                    | 1,114      | 8,912         |
| <b>Total</b>  |                 | <b>23<br/>(50%)</b> | <b>11<br/>(24%)</b> | <b>12<br/>(26%)</b> | <b>46<br/>(100%)</b> | –          | <b>35,018</b> |

Source: CALA Homes

### Justification of scale or provision

A3.2 40% affordable housing is above the policy requirement of 34% (Core Strategy 2008 Policy CSP 4). It is also consistent with the emerging local plan position for housing sites released from the Green Belt and reflects the acute affordable housing needs that exist within Tandridge.

### Plans showing location

A3.3 Drawing no. CB\_36\_313\_004 'Affordable Housing Plan' sets out the location of the affordable homes. They are located in a linear cluster for ease of management purposes.

### Proposed RSL partner and contact with Housing Enabling Staff

A3.4 At this stage the applicant does not have a preferred or proposed RSL partner and TDC's pre-application response (ref. PA/2022/282) only sets out that the Council will expect any development proposal for this site to meet the requirement for 34% of all units to be affordable, in a mix of types and tenures to be agreed. The applicant would welcome a constructive dialogue on any aspect of the proposed affordable housing provision.

### Heads of Terms

A3.5 The 46 affordable homes will be secured via a S106 Agreement, to be agreed before any decision on the application is issued.



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A3.6

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