

Application: 2025/815

Location: Land West of Eastbourne Road, South Godstone, Surrey, RH9 8JY

Proposal: Outline planning application with all matters reserved except means of access and scale for residential development of up to 200 dwellings (Use Class C3), a commercial or community unit (Use Class E or F2), landscaping, public open space, and all associated infrastructure. (Outline)

Ward: Godstone

Decision Level: Chief Planning Officer (delegated decision)

Constraints

Tree Preservation Order within 10m; EA Risk of Surface Water Flooding – 1 in 30, 1 in 100, 1 in 1000; EA Flood Zone 2 area; Godstone Parish; Area of High Archaeological Potential; Green Belt area; Local Road – A – Eastbourne Road, D – Tilburstow Hill Road, T – Townpath – Tilburstow Hill, X – Rushton Avenue, Terracotta Road; Ancient Woodland within 500m; Gatwick Safeguarding – 90m; Area of Special Advertising Consent; Gatwick Bird Strike Zone; Article 4 – ENF/71/4.

RECOMMENDATION:

REFUSE

Summary

The proposal would result in inappropriate development within the Green Belt for which very special circumstances have not been demonstrated to clearly outweigh this, and other identified, harm. It is considered that the proposal would be within a countryside area and would not meet the tests within Paragraphs 143 and 155 (a) and (c) of the National Planning Policy Framework (NPPF).

The application site, is situated within an unsustainable location where there is a lack of supporting infrastructure with infrequent rail and bus services and minimal facilities. In addition, it is considered that the proposal would result in harm to the character of the area.

In these circumstances the application is recommended for refusal.

Site Description

The application site is bounded by the railway line to the north which connects to Godstone Railway Station immediately northeast of the site. It is bounded to the east by the A22 known as Eastbourne Road and to the west by Tilburstow Hill Road. Access to the site would be from both Eastbourne Road and Tilburstow Hill Road.

The application site extends to approximately 9.34ha and is located to the south-west of the village of South Godstone.

The application site is an agricultural field consisting of mainly grassland and divided by a tree belt, hedgerow and ditch that runs from north to south.

Access to the site is currently via field gates from both the eastern and the western boundaries. To the east, there is one existing field gate access point approximately 60m south of the railway bridge and a second in the south-east corner of the site which leads through the farm. To the west, the field gate access point is approximately opposite Rushton Avenue.

Relevant History

PD/2013/1214 - Alterations to proposed road to allow erection of 4 dwellings

PD/2012/1247 - Erection of 4 dwellings

PD/2008/1328 - Residential development.

PD/2007/2235 - Demolition of buildings and erection of dwellings

PD/2007/2169 - Planning enquiry

PD/2007/1481 - Barn conversion

2014/1906 - Demolition of existing dwellings, stables and motor trade workshops/sale facilities and removal of vehicles, agricultural and motor trade use. erection of 9 dwellings with attached double garages and associated access roads. Withdrawn 13/05/2015

- Use of land and buildings for sale of vehicles, inc. storage, repair, maintenance and valeting. (ENF 4/2004)

PD/2004/912 - Erection of shed.

PD/2016/1185 - Erection of 14 x 3 bed affordable housing units, 5 x 3 specialist housing units and 7 x 5 bed detached units. Not yet determined 25/05/2016

PD/2014/1258 - Development of 21 new properties.

2025/487/EIA - EIA Screening Opinion (residential development of up to 200 dwellings and a commercial unit, with associated public open space, surface water drainage and infrastructure) EIA Screening Opinion - Not EIA development 19/05/2025

PA/2024/170 - Mixed-use development comprising circa.190-200 new homes (average density of 30-40dph), including affordable housing, alongside a community and work hub to meet local needs, framed by existing and enhanced green infrastructure and providing public spaces. Advice given 29/10/2024

2023/1253 - Conversion of barn to form a 4-bedroom dwelling and use of the existing track and access to service the development. Approved 10/01/2024

2020/1206 - Conversion of barn to form a 4-bedroom dwelling and use of existing track and access to service the proposed house. Approved 09/09/2020

2019/2077 - Demolition of existing bungalow, outbuildings/garage workshops and erection of 3 x 5 bed dwellings Approved 08/05/2020

2019/1468 - Conversion of barn to create a 4-bed dwelling house and use of existing track and access to service the proposed dwelling Withdrawn 20/11/2019

2018/1984 - Erection of 3 x 5-bed, two storey, detached dwellings following demolition of existing buildings. (Amended) Approved 01/04/2019

2017/196 - Demolition of existing bungalows, outbuildings and garage; erection of 4 detached single storey dwellings. Refused 30/07/2018

2016/1201 - Conversion of barn to dwelling and use of existing track and access to service the proposed dwelling. Approved 12/09/2016

2015/979 - Demolition of existing dwellings, stables and motor trade workshops/sale facilities and removal of vehicles, agricultural and motor trade use. erection of 9 dwellings with attached double garages and associated access roads. Appeal against non-determination 08/01/2016 Appeal Dismissed

2013/1097 - Use of existing access and track to service proposed house approved under ta/2011/158 Approved (full) 01/10/2013

2011/158 - Conversion of barn to 4-bed dwelling. use of cart-lodge for covered parking. - application to extend time limit for implementation of permission 2008/1350. Approved (full) 29/03/2011

2010/1357 - Demolition of two dwellings, stables, workshops and motor trade building. construction of 4 x 5-bedroom detached dwellings. Refuse 18/01/2011 Appeal Dismissed

2008/1350 - Conversion of barn to 4-bed dwelling. use of cart-lodge for covered parking. Approved (full) 07/11/2008

2006/50 - Demolition of 2 dwellings, garage, stables, workshop & motor trade building & erection of 4 x 5-bed & 1 x 4-bed dwellings with associated garaging, parking & use of existing access onto water lane. (outline) Refuse 15/03/2006 Appeal Dismissed

2004/1501/T - Installation of 10m high telegraph pole style telecommunications mast with 2 antennas (overall height 12m) with associated equipment cabinet all enclosed within 2.4m high close boarded fence compound (notification by telecommunications code system operator). No Objection- Telecoms 18/11/2004

2004/78 - Erection of 22.5 metre telecommunication mast and associated equipment cabinet, set within compound enclosed by 2.4-metre-high fence. Refuse 01/03/2004

2001/1223 - Widening of terracotta road and improvement of its junction with Tilburstow Hill Road. Approved (full) 18/12/2001

2001/387 - Erection of pitched roof over existing flat roof, incorporating front and rear dormer windows, to provide new first floor accommodation and erection of rear conservatory. Refuse 11/07/2001

2000/195 - Erection of pitched roof over existing flat roof incorporating front and rear dormer windows and rear conservatory. Refuse 20/04/2000

98/1069 - Demolition of timber buildings and retention of single storey building to provide storage space, 2 stables & feed store. Approved (full) 15/06/1999

97/1171 - Formation of trackway and hardstanding. Approved (full) 10/03/1998

96/438 - Application to the secretary of state for transport for an order under the transport works act 1992 to authorise the construction and operation of a new railway to the midlands via London to the channel tunnel London from the channel tunnel. Withdrawn/substituted 26/07/1996

92/609 - Re-building of front wall and construction of tiled upstand roof. Approved (full) 14/01/1993

91/450 - Change of use of agricultural buildings to stabling and the land to equestrian use Approved (full) 05/06/1992

91/452 - variation of agricultural occupancy condition imposed under 83/1014 & 90/1269 to allow occupancy in connection with equestrian use Approved By Letter 05/06/1992

87/1055 - Improvement and re-siting of field access. Approved (full) 17/11/1987

85/556 - Conversion of (unit 2) into part of elderly person's home. Approved (full) 22/07/1986

85/469 - Alterations to elevations and re-roofing of 'ballroom' unit Approved (full) 17/06/1985

84/1000 - Conversion of existing dwelling into 5 residential units Approved (full) 05/02/1985

GOR/284/72 - RESIDENTIAL CARAVAN SITE ON APPROX 7.5 ACRES Refuse 04/08/1972

GOR/628/70 - ERECTION OF DWELLING FOR USE IN CONNECTION WITH MARKET GARDEN OR NURSARY Withdrawn/substituted 19/05/1971

GOR/22320 - 22 BUNGALOWS WITH GARAGES Refuse 19/12/1962

GOR/3941 - DEMOLITION OF EXISTING BUILDINGS AND RESIDENTIAL DEVELOPMENT OF ABOUT 8 ACRES Refuse 19/08/1959

GOR/3050 - RESIDENTIAL DEVELOPMENT AT 6 HOUSES PER ACRE ON ABOUT 2 1/2 ACRES OF LAND Refuse 09/09/1957

GOR/2476 - RESIDENTIAL DEVELOPMENT OF APPROX 2 1/3 ACRES OF LAND AT 6 DWELLINGS PER ACRE Refuse 17/05/1956

GOR/938 - USE OF SITE FOR STATIONING ONE CARAVAN Refuse 11/05/1953

Key Issues

The application site lies wholly within the Green Belt and is outside of any defined settlement. Key issues relate to location, environmental matters, sustainability, infrastructure, housing land supply affordable housing provision, the need for any extra care provision in the area, character and appearance, neighbouring and future residential amenities, biodiversity and ecology, trees, flooding, heritage, aviation, highway impacts, public rights of way and any other matters as shall be discussed.

Proposal

This application seeks outline planning permission (with all matters reserved except for the means of access and scale) for a residential development of up to 200 dwellings (Use Class C3), the provision of a commercial or community unit in Use Class E or F2 together with landscaping, a public open space and associated infrastructure.

Development Plan Policy

Tandridge District Local Plan – Part 2: Detailed Policies (2014)

DP1: Sustainable Development

DP5: Highway Safety & Design

DP7: General Policy for New Development

DP10: Green Belt

DP12: Development in Defined Villages in the Green Belt

DP13: Buildings in the Green Belt

DP18: Community, Sports & Recreational Facilities

DP19: Biodiversity, Geological Conservation & Green Infrastructure

DP20: Heritage Assets

DP21: Sustainable Water Management

DP22: Minimising Contamination, Hazards & Pollution

Tandridge District Core Strategy (2008)

Policy CSP1: Location of Development

Policy CSP2: Housing Provision

Policy CSP3: Managing the delivery of housing

Policy CSP4: Affordable Housing

Policy CSP7: Housing Balance

Policy CSP11: Infrastructure and Services

Policy CSP12: Managing Travel Demand

Policy CSP13: Community, Sport and Recreation Facilities and Services

Policy CSP14: Sustainable Construction

Policy CSP15: Environmental Quality

Policy CSP17: Biodiversity

Policy CSP18: Character and Design

Policy CSP19: Density

Policy CSP21: Landscape and Countryside

Supplementary Planning Documents (SPDs), Supplementary Planning Guidance (SPGs) and non-statutory guidance

Interim Policy Statement for Housing Delivery (2022)

Tandridge Parking Standards SPD (2012)

Tandridge Trees and Soft Landscaping SPD (2017)

Surrey Design Guide (2002)

Surrey Hills National Landscape Management Plan 2025-2030

National Advice

National Planning Policy Framework (NPPF) (2024)

Planning Practice Guidance (PPG)

National Design Guide (2019)

Consultation Responses

Planning Policy - Policy CSP1 of the Core Strategy directs development toward defined built-up areas and establishes the spatial strategy for the district. **South Godstone is not identified as one of the principal Category 1 settlements and is a lower-order settlement in the district hierarchy. The application site lies outside the defined settlement boundary and within the Green Belt.**

As such, the proposal conflicts with the spatial strategy set out in Policy CSP1, which seeks to direct development to the most sustainable settlements and to manage development outside settlement boundaries.

Biodiversity Net Gain

In accordance with the Town and Country Planning Act 1990, as amended by the Environment Act 2021, development must deliver a minimum 10% Biodiversity Net Gain. The applicant's material indicates that the scheme relies on a combination of on-site and off-site biodiversity measures to achieve the required net gain.

Given the scale of the proposal and the reliance on off-site measures, BNG should be independently verified prior to determination or secured through the statutory biodiversity gain condition and any necessary Section 106 agreement. The Council should ensure that the Biodiversity Gain Plan, habitat management and monitoring arrangements, off-site land, responsible parties and long-term maintenance obligations are robustly secured.

Developer Contributions

Development would also be expected to deliver appropriate contributions in the form of CIL monies or a S106 agreement: A financial contribution can be sought against the requirements of Regulation 122 of the Community Infrastructure Levy regulations 2010 which have arisen from something necessary to make the development acceptable in planning terms; or something directly related to the development; or something fairly and reasonably related in scale and kind to the development.

Surrey County Highways Authority – (response dated 4th September 2025)

The proposed development has been considered by THE COUNTY HIGHWAY AUTHORITY (CHA) who has assessed the application on safety, capacity and policy grounds and recommends the proposal be refused on the grounds that:

1. The Applicant has failed to demonstrate that adequate provision could be made in terms of sustainable modes of transport, thereby representing car dependant development contrary to the requirements of the National Planning Policy Framework (NPPF) 2024, in particular paragraphs 115 and 117, contrary to the objectives of the Surrey Local Transport Plan 4 (LTP4) and contrary to policy DP5 of the Tandridge Local Plan.

2. The Applicant has failed to demonstrate that safe access could be provided to the site for all users, representing a material risk of unacceptable detriments to the safe operation of the public highway contrary to paragraph 116 of the NPPF 2024, contrary to the objectives of the Surrey LTP4 and contrary to policy DP5 of the Tandridge Local Plan.

With regard to road safety, the CHA stated:

Residents of the proposed development would be at a risk of conflict with fast moving vehicles on a busy road (the A22/ Eastbourne Road) if they choose to walk, particularly, due to the constraints under the bridge as previously mentioned. There is also a road safety concern associated with the risk of vehicles striking the bridge, it was recommended that National Railway are consulted about this, however, there does not seem to be any commentary from them regarding this matter.

The proposals are not LTN1/20 compliant and lack suitable cycle infrastructure to bus stops and essential day-to-day facilities, and as mentioned above, Eastbourne Road is a busy road with relatively high speeds which is not conducive to active travel, as such the proposals represent an unacceptable risk to the safe operation of the public highway.

Officer comment – It is noted that, although further discussions have since taken place, the issues and concerns raised by the Highways Authority have not been resolved at the time of writing this report and no further comments have been received from the CHA.

National Highways – No objection

Network Rail - Further to Network Rail's previous response to the above planning application, I can confirm that following discussions with the applicant and their consultants a financial contribution has been agreed towards improving accessibility at Godstone Station. This contribution will be used to fund an enhanced means of access to the southern platform. In addition to this, Network Rail also agrees with the extent of the land to be safeguarded for an improved access from the site as shown on the submitted masterplan. As such, subject to the financial contribution being included as a planning obligation in a draft s106 legal agreement, and the safeguarded land being retained on the approved plans, Network Rail is satisfied that the needs at the station have been met.

Godstone Parish Council - Objection on the basis that the proposed access and road and traffic management is inadequate. The proposal to widen the pavement and narrow the road will lead to traffic chaos on this busy trunk road.

Tandridge Housing - The applicant is proposing a residential development of 200 dwellings which gives rise to an onsite affordable housing requirement of 49% (98 dwellings) in line with para 156-157 "the Golden Rules" of the NPPF. The applicant is proposing that only 34% of the onsite affordable dwellings are provided in line with the requirements of policy CSP4 with the balance to be provided as 'intermediate dwellings' or 'affordable home ownership'. The expectation from the Council is that 'affordable home ownership' dwellings take the form of shared ownership and are delivered, together with the rented dwellings, by a registered provider.

The proposed mix for the scheme is as follows:

Dwelling Type	Intermediate dwellings / Affordable home ownership	Social/Affordable rented
1b2p	14	9
2b4p	29	21
3b5p	7	18

The Council's preferred mix would be as below:

Dwelling Type	Shared Ownership (25%)	Social/Affordable rented (75%)
1b2p		20
2b4p	12	29
3b5p	12	25

The applicant should note that there is limited interest in the delivery of 1-bed shared ownership units from registered providers due to low demand. The applicant is therefore encouraged to engage with a registered provider at the earliest opportunity and in advance of any reserved matters application in order to agree a mix that both meets the affordable housing needs of the district and is deliverable from an RP perspective.

The linear shape of the development site and proximity to the railway line means that consideration needs to be given to the location of the affordable housing units. They should be interspersed, with the market units, throughout the development and not concentrated adjacent to the railway line. Furthermore, a tenure blind approach should be adopted in terms of design and materials in order to encourage a sustainable community and social integration.

Lead Local Flood Authority - The applicant has provided sufficient information to address our previous comments. We are satisfied that the proposed surface water drainage scheme meets the requirements set out in the aforementioned documents and are content with the development proposed should planning permission be forthcoming.

Surrey County Council Historic Environment – their full comments can be found in the body of this report

Surrey County Council Archaeologist - their full comments can be found in the body of this report

Surrey Police - The security of the railway must always be considered to ensure there is no potential for the railway line to be affected, impacted or compromised. These are the British Transport Police, (BTP) DOCO comments regarding this application at this stage:

Trespass: The addition of residential units, built close to the railway line, brings an increased risk of trespass. Therefore, please consider replacing the railway boundary/perimeter fencing with 2.4m high fencing, tested and certified by the BRE to LPS 1175 BR3+ with welded metal mesh, 4mm wire strand fabrication, and a 76.2mm width x 12.7mm height aperture to reduce the opportunity of climbing. There must be no achievable place for unofficial access onto, or across, the rail line for access.

Planting: No trees or climbing shrubs should create a nuisance through falling leaves or penetration of roots or provide a means of gaining access to the railway. Planting, etc. must not interfere with sight lines, clearances, drainage and other services etc. New works or lighting must not affect any sight lines, signal sighting, lighting or CCTV covering the station and rail lines.

Gatwick Airport Limited – Aerodrome Safeguarding – The proposed development has been examined from an aerodrome safeguarding perspective and could conflict with safeguarding criteria unless any planning permission granted is subject to condition.

Public Representations/Comments

Third Party Comments

Numerous written representations have been received objecting on grounds which are summarised as follows:

- Exacerbation of flooding
- Additional children but no available schools
- Additional residents but no available doctors or dentists
- Additional cars as there is poor access to public transport
- Will destroy the character of the village
- Traffic lights under the Eastbourne Road bridge unacceptable
- Schools, Doctors and Dentists in the area already oversubscribed
- A22 is already over capacity, highly congested at all times
- Inappropriate development on the Green Belt
- Total lack of supporting infrastructure
- Surface water drainage issue
- Is affordable housing really affordable?
- The development adversely affects the public highway
- Very poor rail service and onward connections
- Lack of local employment activities
- Both of the proposed accesses lead onto two minor roads
- Increased volume of traffic would be unacceptable
- Not Grey belt and not previously developed land
- What is the point of a small commercial store within the development?
- What exactly would the community resource be and who would it benefit
- Unsustainable location
- The impact on nature and biodiversity will be disproportionate to the benefits and with no real plans suggested for mitigation.
- The scale and density of the proposed development are disproportionate to the character and capacity of the local area. It represents an unsustainable expansion that threatens to alter the identity of our community, overwhelm local services, and disrupt the balance between urban and rural spaces.
- The development would undermine the openness and integrity of the green belt, set an undesirable precedent for further encroachment and erodes the Council's ability to safeguard protected land

Assessment

Procedural Note:

The Tandridge District Core Strategy and Detailed Local Plan Policies predate the NPPF as published in 2024. However, paragraph 232 of the NPPF (Annex 1) sets out that existing policies should not be considered out-of-date simply because they were adopted prior to the publication of the Framework document. Instead, due weight should be given to them in accordance with the degree of consistency with the current Framework.

In the absence of a five-year supply of housing, it is necessary to apply the presumption in favour of development as set out in paragraph 11 of the NPPF. For decision making, this means that 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 this Framework that protect areas or assets of particular importance provides a strong 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 this Framework taken as a whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination.*

With regards to paragraph 11 (d) (i), footnote 7 explains the concept of “specific policies” in the NPPF indicating that development should be restricted. This includes development relating to sites within the Metropolitan Green Belt and Heritage assets. It is therefore necessary to assess whether the proposal would be appropriate within the Green Belt before applying an assessment under Paragraph 11 (d) (i) which will be undertaken at the end of this report.

Green Belt

The NPPF 2024 supports the protection of Green Belts and the restriction of development within these designated areas. Paragraph 142 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 the Green Belt being its openness and permanence.

Paragraph 153 of the NPPF states: When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt, including harm to its openness (*Other than in the case of development on previously developed land or grey belt land, where development is not inappropriate*). Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. ‘Very special circumstances’ 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.

Paragraph 154 states that a local planning authority should regard the construction of new buildings as inappropriate in the Green Belt and lists a number of exceptions. The proposed development would not, however, fall within any of those listed exceptions.

Paragraph 155 sets out that ‘the development of homes, commercial and other development in the Green Belt should also not be regarded as inappropriate where all the following apply:

- a. *The development would utilise grey belt land and would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan*
- b. *There is a demonstrable unmet need for the type of development proposed*
- c. *The development would be in a sustainable location, with particular reference to paragraphs 110 and 115 of this Framework*
- d. *Where applicable the development proposed meets the ‘Golden Rules’ requirements set out in paragraphs 156-157 below.*

Paragraph 156 states: Where major development involving the provision of housing is proposed on land released from the Green Belt through plan preparation or review, or on sites in the Green Belt subject to a planning application, the following contributions (‘Golden Rules’) should be made:

- a. affordable housing which reflects either: (i) development plan policies produced in accordance with paragraphs 67-68 of this Framework; or (ii) until such policies are in place, the policy set out in paragraph 157 below
- b. necessary improvements to local or national infrastructure; and
- c. the provision of new, or improvements to existing, green spaces that are accessible to the public. New residents should be able to access good quality green spaces within a short walk of their home, whether through onsite provision or through access to offsite spaces

Grey Belt is defined within the NPPF as *“land in the Green Belt comprising previously developed land and/or any other land that, in either case, does not strongly contribute to any of purposes (a), (b), or (d) in paragraph 143. ‘Grey belt’ excludes land where the application of the policies relating to the areas or assets in footnote 7 (other than Green Belt) would provide a strong reason for refusing or restricting development.”*

In assessing planning applications within the Green Belt, it is also considered relevant to acknowledge the steps which the Government’s Planning Practice Guidance indicates should be undertaken in order to carry out the Green Belt assessment process and to relate it to the current development proposal.

The PPG states that:

In order to assess the Green Belt in the relevant local or strategic development area effectively, authorities will need to:

- *identify the location and appropriate scale of area/s to be assessed*
- *evaluate the contribution each assessment area makes to Green Belt purposes (a), (b), and (d), using the criteria identified below*
- *consider whether applying the policies relating to the areas or assets of particular importance in footnote 7 to the NPPF (other than Green Belt) would potentially provide a strong reason for refusing or restricting development of the assessment area*
- *identify grey belt land*

- *identify if the release or development of the assessment area/s would fundamentally undermine the five Green Belt purposes (taken together) of the remaining Green Belt when considered across the area of the plan*

Paragraph: 003 Reference ID: 64-003-20250225

Policy DP10 of the Local Plan reflects paragraphs 152-160 of the NPPF in setting out that inappropriate development in the Green Belt is, by definition, harmful and that substantial weight must be attributed to this harm. Permission should only be granted where very special circumstances can be demonstrated to outweigh the harm by reason of inappropriateness and any other harm identified.

Policy DP12 states that A. In the Green Belt development within the Defined Villages of Bletchingley, Blindley Heath, Dormansland, Felbridge, Godstone, Old Oxted, South Godstone, South Nutfield and Tatsfield as shown on the Policies Map will be permitted where the proposal comprises:

1. Infilling within an existing substantially developed frontage; this does not include the inappropriate subdivision of existing curtilages to a size below that prevailing in the area
2. The partial or complete redevelopment of previously developed land, even if this goes beyond the strict definition of infilling
3. The development of sites within the village's boundaries following allocation for affordable housing
4. Extensions or alterations to existing buildings and the erection of new ancillary domestic buildings within the curtilage of a dwelling
5. Development that provides new, or assists in the retention of, community facilities
6. Any other form of development that is defined by the National Planning Policy Framework as not being inappropriate in the Green Belt.

B. In all circumstances, infilling, redevelopment and other forms of development must be in character with the village, or that part of it, and will be subject to any other relevant Development Plan policies

Policy DP13 states that unless very special circumstances can be clearly demonstrated, the Council will regard the construction of new buildings as inappropriate in the Green Belt. Policy DP13 sets out the exceptions to this, one of which (Part G) is the limited infilling or the partial or complete redevelopment of previously developed (brownfield) sites in the Green Belt, whether redundant or in continuing use (excluding temporary buildings), where the proposal would not have a greater Impact on the openness of the Green Belt and the purpose of including land within it than the existing development. Also to note is (Part I) Any other form of development as listed under paragraph 90 of the NPPF.

Annex 2 of the NPPF (2024) sets out a number of definitions and includes the following as a definition of previously developed land. This is as follows:

Land which has been lawfully developed and is or was occupied by a permanent structure and any fixed surface infrastructure associated with it, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed). It also includes land comprising large areas of fixed surface infrastructure such as large areas of hardstanding which have been lawfully developed. Previously developed land excludes: land that is or was last occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill, where provision for restoration has been made through

development management procedures; land in built-up areas such as residential gardens, parks, recreation grounds and allotments; and land that was previously developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape.

The application site comprises “*agricultural land*” and therefore does not constitute previously developed land under the terms of the NPPF.

The proposal is not considered to fall within any of the categories of development specified as exceptions to the general presumption against inappropriate development in the Green Belt detailed in paragraph 154 of the NPPF. This assessment will therefore consider the proposal in relation to grey belt and against the requirements of paragraph 155.

Grey Belt Assessment:

The Council is currently undertaking an updated Green Belt Assessment and has made no formal decision as to what areas of the Green Belt in Tandridge, if any, may be considered to constitute grey belt land.

As set out within the definition above grey belt land is land which does not strongly contribute to any of purposes (a), (b), or (d) of the Green Belt detailed in paragraph 143 of the NPPF nor that a footnote 7 policy (excluding Green Belt) which provides a strong reason for refusing the development is relevant. The Planning Practice Guidance on Green Belt, last updated on 27 February 2025, provides guidance on the assessment of a site’s contribution to Green Belt purposes. This will be used in the assessment below to assess the sites contribution to the purposes.

In this case, as South Godstone is a village and is not considered to be a large built-up area for the purposes of Green Belt Purpose (a). The site is therefore unlikely to strongly contribute to Purpose (a). Similarly, the site does not perform a strong role in preventing neighbouring towns from merging, and Purpose (b) is not materially engaged in the same way as it would be in relation to land between towns. Purpose (d), relating to the setting and special character of historic towns, is also not considered to be strongly engaged.

On that basis, the land may be capable of falling within the definition of Grey Belt for the purposes of the NPPF. The Council is currently undertaking a Green Belt Review as required by central government and until this is concluded the land cannot be formally considered to comprise ‘grey belt’ land.

However, that is not the end of the paragraph 155 assessment. Criterion (a) requires not only that the development would utilise Grey Belt land, but also that the proposal would not fundamentally undermine the purposes, taken together, of the remaining Green Belt across the area of the plan.

Purpose (c), which relates to assisting in safeguarding the countryside from encroachment, is not part of the definitional test for Grey Belt. However, it remains directly relevant to the wider Green Belt assessment, to openness, and to whether the proposal would fundamentally undermine Green Belt purposes when taken together.

The site comprises open pastureland at the edge of South Godstone. It is not previously developed land and is not a small-scale infill site. The proposal would introduce up to 200 dwellings, estate roads, parking, lighting, domestic activity, associated infrastructure and a commercial/community unit into land which is currently rural and undeveloped. Although the site has the railway line to the north and the A22

to the east, these features do not remove the site's countryside character or its contribution to the open setting of the settlement.

The scale of development is material. The masterplan identifies a developable area of approximately 4.95ha, meaning that a substantial part of the site would be urbanised. Whilst the proposal includes green infrastructure and landscape buffers, that does not avoid the fundamental change in character from open countryside to a residential-led urban extension.

The development would result in a clear encroachment into the countryside. It would also alter the relationship between South Godstone and its surrounding rural context by introducing a significant new residential neighbourhood at a lower-order settlement where the Development Plan does not currently direct strategic growth.

The Green Belt function of the land includes its openness, its undeveloped character, and its role in preventing the incremental spread of development beyond the settlement edge. In this case, the proposed development would materially weaken that function.

Accordingly, whilst the site may be capable of being treated as Green Belt in definitional terms, it has not been demonstrated that the development would avoid fundamentally undermining the purposes of the Green Belt when taken together. The proposal would give rise to significant harm in respect of Purpose (c), by reason of encroachment into the countryside, and would materially reduce the openness of the Green Belt in this location.

Criterion (b) requires that there is a demonstrable unmet need for the type of development proposed. It is accepted that the Council cannot currently demonstrate a five-year housing land supply.

Criterion (c) requires that the development would be in a sustainable location, with particular reference to paragraphs 110 and 115 of the NPPF. The applicant relies principally on the site's proximity to Godstone Railway Station, nearby bus stops, local facilities within South Godstone, and proposed pedestrian and cycle improvements. However, the County Highway Authority has reviewed the application on safety, capacity and policy grounds and has recommended refusal. This is a material consideration in the assessment of whether the proposal satisfies paragraph 155(c).

The County Highway Authority concludes that the applicant has failed to demonstrate that adequate provision could be made for sustainable modes of transport. It considers that the proposal would represent car-dependent development, contrary to the NPPF, the objectives of Surrey Local Transport Plan 4 and Policy DP5 of the Tandridge Local Plan. The Highway Authority also concludes that the applicant has failed to demonstrate that safe access could be provided to the site for all users, giving rise to a material risk of unacceptable detriment to the safe operation of the public highway.

Although the site is physically close to Godstone Railway Station, the Highway Authority has identified that the submitted information lacks certainty regarding what rail access improvements would actually be delivered. The applicant refers to possible lift access between the northern and southern platforms, or ramp access from the south, but neither option has been explored in sufficient detail. The Highway Authority also notes that the rail service itself is limited in terms of onward connectivity and frequency. As such, proximity to the station does not, on the evidence currently before the Council, demonstrate that the site would provide a genuine or effective choice of sustainable transport modes.

Similarly, the Highway Authority has identified that the proposal lacks suitable pedestrian and cycle connections to bus stops, particularly on the A22, due to constraints under the railway bridge. It also notes that bus services are infrequent and limited, and that the development does not include bus priority. These matters substantially weaken the applicant's case that the development would be accessible by sustainable modes.

The Highway Authority's comments are particularly significant because paragraph 155(c) requires specific reference to paragraphs 110 and 115 of the NPPF. Paragraph 110 seeks to focus significant development in locations which are, or can be made, sustainable through limiting the need to travel and offering a genuine choice of transport modes. Paragraph 115 requires, among other matters, that sustainable transport modes are prioritised, that safe and suitable access can be achieved for all users, and that any significant impacts on the transport network or highway safety can be effectively mitigated. On the basis of the Highway Authority's objection, these requirements have not been met.

The Highway Authority further identifies that the site scores 44 on the Department for Transport Connectivity Tool, placing it approximately within the bottom 15th percentile for connectivity across England and Wales. This is a clear indication that, notwithstanding the presence of a railway station nearby, the site performs poorly in broader accessibility and connectivity terms. That finding is consistent with the Highway Authority's conclusion that the proposal would not provide a meaningful choice of travel modes or secure any material shift away from private car use.

It is therefore not appropriate to conclude that criterion (c) is satisfied. The relevant test is not simply whether services exist within the wider area, but whether the development would be in a sustainable location having regard to the ability to prioritise sustainable transport, provide safe and suitable access for all users, and offer a genuine choice of transport modes. The Highway Authority's objection demonstrates that these matters have not been adequately addressed.

Accordingly, the proposal fails to satisfy criterion (c) of paragraph 155 of the NPPF. As paragraph 155 requires all criteria to be met, this failure is determinative. The proposal does not benefit from the paragraph 155 route to being treated as not inappropriate development in the Green Belt.

As inappropriate development, the proposal attracts substantial weight against it. Very special circumstances are therefore required.

The issue of very special circumstances will be discussed later in this report.

Housing Land Supply

The NPPF at paragraph 78 sets out a requirement for local planning authorities to identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of 5 years' worth of housing against their local housing need where strategic policies are more than five years old. The supply of specific deliverable sites should in addition include a buffer of 20% where there has been significant under delivery of housing over the previous three years to improve the prospect of achieving the planned supply. Footnote 39 of the NPPF provides that where local housing need is used as the basis for assessing whether a supply of specific deliverable sites exists, it should be calculated using the standard method set out in national planning guidance.

The Tandridge Core Strategy housing delivery policy (CSP2) is more than five years old. Five-year housing need assessed against the standard method, together with the

required 20% buffer, gives a requirement of 4,964 dwellings, or 993 per annum, including a 20% buffer. Current housing land supply in Tandridge district is 2.17 years. In September 2022, the Council adopted an Interim Policy Statement for Housing Delivery (IPSHD) which sets out criteria for bringing forward new housing to boost the supply because of the problems with the then emerging Local Plan which later had to be withdrawn. Since the IPSHD was adopted, permission has been granted by the Council for a number of large Green Belt sites that comply with the criteria in the IPSHD.

The IPSHD states:

Development will be supported where proposals meet the following criteria and are in accordance with the Council's development plan:

- i. Provide for the re-development of previously developed land in the urban areas and the Green Belt
- ii. Housing sites included in the emerging Local Plan where the Examiner did not raise concerns (see Appendix A)
- iii. Sites allocated for housing development in adopted Neighbourhood Plans which will make a contribution to the overall delivery of housing in the District
- iv. Provide for the release of infill or re-development sites in settlements washed over by the Green Belt where this would not conflict with maintaining the openness of the Green Belt
- v. Constitute enabling development (for charitable development or heritage asset conservation purposes) (See Appendix B);
- vi. Housing development meeting a recognised local community need or realising local community aspirations including affordable housing and the bringing forward of rural exception schemes in appropriate locations
- vii. Sites that deliver flood mitigation measures for already identified areas of the District at serious risk of flooding

and any such sites identified according to the above criteria must be deliverable and viable, having regard to the provision of any necessary on-site and off-site infrastructure, affordable housing requirements and payment of the Community Infrastructure Levy.

The site was not proposed for allocation in the withdrawn Local Plan, nor does it meet any of the other criteria listed in the IPSHD. The IPSHD, therefore, does not provide any material weight in favour of the proposed development.

Sites have already been delivered as part of the adopted IPSHD. These are:

- a. Application 2022/1161, May 2023: young Epilepsy, St Piers Lane, Lingfield - provision of a residential care community (Use Class C2) comprising 152 units of accommodation.
- b. Application 2022/1658, December 2023: Plough Road, Smallfield – for 120 dwellings including 40% affordable housing and flood relief engineering works.
- c. Application 2022/267, December 2023: Former Shelton Sports Club, Warlingham – for 150 dwellings including 45% affordable housing.
- d. Application 2022/1523, September 2024: Land at Former Godstone Quarry – for 140 dwellings including 50% affordable housing and a new GP surgery.

e. Application 2024/1389, July 2025: Redehall Road, Smallfield – for 85 dwellings including 40% affordable housing.

f. Application 2024/1393, July 2025: 1 Park Lane, Warlingham – for 45 dwellings including 49% affordable housing.

The above sites have contributed significantly to the Council's current housing land supply. There are other sites that are likely to come forward that meet the criteria in the IPSHD and are expected to further boost the supply.

By way of demonstrating progress in housing delivery since the IPSHD was adopted, under the previous standard method (23/24 OAN) the most up to date figure would show an increase from 1.9 years to 2.68.

By way of demonstrating progress in housing delivery since the IPSHD was adopted, under the previous standard method (23/24 OAN) the most up to date figure would show an increase from 1.9 years to 2.68.

The Council has successfully defended the refusal of planning permission for housing development applications on sites in the Green Belt which did not accord with the IPSHD, as follows:

- APP/M3645/W/23/3319149: Station Road, Lingfield. The Inspector referenced the IPSHD in paragraph 15 of his decision letter stating: "For this appeal it is a material consideration when considering the benefit arising from the additional supply of housing, but I only give it limited weight because of its non-statutory status."

- APP/M3645/W/24/3345915: Chichele Road, Oxted. The Inspector referenced the IPSHD in paragraph 9 of her decision letter: "...I note that the appeal site was not brought forward as a proposed housing allocation in the submitted eLP and thus does not meet the criteria for inclusion within the IPSHD. I shall treat the IPSHD as a material consideration for this appeal, particularly as a mechanism used by the Council to address its housing need. However, as it does not form part of the development plan, this limits the weight which can be afforded to this document." In the determination of both of these appeals the IPSHD was found to be a material consideration.

It is acknowledged that, in the absence of a five-year housing land supply, and notwithstanding the progress being made in housing delivery in Tandridge District through the adoption and implementation of the IPSHD, significant weight should be given to the proposal in this planning application for the delivery of market and affordable housing in the overall planning balance

Housing Balance

Policy CSP7 requires proposals to contain an appropriate mix of dwellings in accordance with current identified needs. The Council's evidence base includes a Strategic Housing Market Assessment 2015 and its 2018 update. The SHMA and its outputs are reflected in our Housing Strategy Policy HS1: Market Housing, which is contained in the Council's most recent Housing Strategy (A Place to Call Home; 2019) which sets the direction for a variety of housing typologies.

In terms of size of housing, the SHMA highlights that the smallest need across the district is likely to be for 1-bed units (10%), with need for 2-bed units (across flats and houses) amounting to 26% followed by 29% need for 4+ bed-units and the greatest need for 3-bed units at 35%. The evidence base should be used to guide the type and

size of housing provided in order that any proposal provides a mix which suits the district's needs.

The application form indicates that the proposal is for 200 residential units with a 49/51% split between social housing and market housing

There will be the following for market housing with a total of 102

3b5p 53 (52%)

4b8p 49 (48%)

With regard to social housing a total of 98 units is proposed as follows

1b2p 23 (23.5%)

2b4p 50 (51%)

3b5p 25 (25.5%)

As such, the scheme appears to generally accord with the mix of housing required and given the sites location within a semi-rural area the mix of homes is considered appropriate. However, while the proposed development would accord with Policy CSP7 of the Core Strategy 2008 it would not outweigh the other harm identified within this report

Affordable Housing

The affordable housing provision will need to be set in the context of national and local planning guidance. Policy CSP4 of the Core Strategy states, the Council will require that a proportion of new dwellings built in the district will be affordable, to be available to people on lower incomes, unable to afford housing at the prevailing market price or who need to live within the district.

The NPPF December 2024 describes affordable housing as:

Housing for sale or rent, for those whose needs are not met by the market (including housing that provides a subsidised route to home ownership and/or is for essential local workers); and which complies with one or more of the following definitions:

a) Social Rent: meets all of the following conditions: (a) the rent is set in accordance with the Government's rent policy for Social Rent; (b) the landlord is a registered provider; and (c) it includes provisions to remain at an affordable price for future eligible households, or for the subsidy to be recycled for alternative affordable housing provision.

b) Other affordable housing for rent: meets all of the following conditions: (a) the rent is set in accordance with the Government's rent policy for Affordable Rent, or is at least 20% below local market rents (including service charges where applicable); (b) the landlord is a registered provider, except where it is included as part of a Build to Rent scheme (in which case the landlord need not be a registered provider); and (c) it includes provisions to remain at an affordable price for future eligible households, or for the subsidy to be recycled for alternative affordable housing provision. For Build to Rent schemes affordable housing for rent is expected to be the normal form of affordable housing provision (and, in this context, is known as Affordable Private Rent).

c) Discounted market sales housing is that sold at a discount of at least 20% below local market value. Eligibility is determined with regard to local incomes and local

house prices. Provisions should be in place to ensure housing remains at a discount for future eligible households.

d) Other affordable routes to home ownership is housing provided for sale that provides a route to ownership for those who could not achieve home ownership through the market. It includes shared ownership, relevant equity loans, other low-cost homes for sale (at a price equivalent to at least 20% below local market value) and rent to buy (which includes a period of intermediate rent). Where public grant funding is provided, there should be provisions for the homes to remain at an affordable price for future eligible households, or for any receipts to be recycled for alternative affordable housing provision or refunded to Government or the relevant authority specified in the funding agreement.

Policy CSP4 of the Core Strategy indicates that in order to maximise the supply of affordable housing the Council will require:

- on sites within the built-up areas of 15 units or more or sites of or greater than 0.5 hectare; and
- on sites within the rural areas of 10 units or more

that up to 34% of the dwellings should be affordable

The Policy indicates that the actual provision will be negotiated on a site-by-site basis after taking into account market and site conditions. It further states that affordable housing may be in the form of social rented or intermediate or a mix of both. The Council may require up to 75% of the affordable housing on a site to be social rented, the precise proportions will be agreed with the Council having regard to the specific needs at the time and within the area

The Policy confirms that there will be a presumption that affordable housing will be provided on the development site, however, in some circumstances the Council may accept an off-site contribution on another site provided by the developer; such alternative site may trigger a requirement for affordable housing itself, such a requirement will be on top of the alternative site provision. The Council will retain the discretion to accept such alternative provision, particularly having regard to the need to contribute to mixed communities

It is stated that if an alternative site is not available and the Council and the developer both consider that it would be preferable that a financial contribution should be made towards affordable housing provision on another site within the District, the Council will require the developer to enter into a legal agreement to secure that provision. The financial contribution will be broadly equivalent in value to the on-site provision.

Paragraph 156 of the NPPF is also directly relevant and indicates, amongst other things, that:

Where major development involving the provision of housing is proposed on land released from the Green Belt through plan preparation or review, or on sites in the Green Belt subject to a planning application, the following contributions ('Golden Rules') should be made: a. affordable housing which reflects either: (i) development plan policies produced in accordance with paragraphs 67-68 of this Framework; or (ii) until such policies are in place, the policy set out in paragraph 157 below

Paragraph 157 confirms:

Before development plan policies for affordable housing are updated in line with paragraphs 67-68 of this Framework, the affordable housing contribution required to satisfy the Golden Rules is 15 percentage points above the highest existing affordable housing requirement which would otherwise apply to the development, subject to a cap of 50%. In the absence of a pre-existing requirement for affordable housing, a 50% affordable housing contribution should apply by default. The use of site-specific viability assessment for land within or released from the Green Belt should be subject to the approach set out in national planning practice guidance on viability.

The application proposal states that it would provide 49% affordable housing provision. The Housing Team have indicated their preferred tenure split which differs slightly from that proposed however, if planning permission had been forthcoming this would have been explored further.

Given the above conclusions the proposal would comply with the requirements of Policy CSP4 of the Core Strategy 2004 and the NPPF and would provide marginally below the requirement specified in paragraph 156 of the NPPF by two units.

Character and appearance

It is noted that this application is for outline planning permission and that access and scale are the only matters for detailed consideration. The submitted documents in respect of access and illustrative layout have been provided. But it is noted that the layout could change going forward. A parameter plan showing where the different aspects of the development will be provided but without a proper layout and scale it has not been demonstrated that there would be no harm to the character and appearance of the wider area

The NPPF (2024) states that design is integral to sustainable development and that the creation of high-quality buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.

The Tandridge Core Strategy predates the NPPF, but the national policy advises that existing policies should not be considered out-of-date simply because they were adopted or made prior to the publication of the Framework. Due weight should be given to them, according to their degree of consistency with the Framework.

Tandridge Core Policy CSP18, seeks to ensure that new development is of a high standard of design that must reflect and respect the character, setting and local context, including those features that contribute to local distinctiveness. Development must also have regard to the topography of the site, important trees or groups of trees and other important features that need to be retained. This is detailed further within Policy DP7 which sets out the expectations of the LPA in terms of design and quality of development. These policies are consistent with the NPPF and should therefore be accorded significant weight in the assessment of this application.

The submitted Illustrative Masterplan sets out the different areas of development. There will be four parcels of residential areas separated by formal green spaces with the commercial/community element (with flats above) located at the eastern end of the site just north of the main access.

The design and access statement sets out the scale and massing of the site which may be subject to change. The houses will be between 2-3 storeys in height. While the majority of the buildings will feature a pitched roof, others will have flat roofs and parapets. Where not integral to the dwelling, garages will be one storey, again, with pitched or flat roofs.

The document also sets out that the buildings will be 2.5 storeys in height but without the full details it is difficult to consider fully the impact of development on the character of the area.

The Development Management Procedure Order (2015) sets out:

Applications for outline planning permission

- (1) Where an application is made to the local planning authority for outline planning permission, the authority may grant permission subject to a condition specifying reserved matters for the authority's subsequent approval.
- (2) Where the authority who are to determine an application for outline planning permission are of the opinion that, in the circumstances of the case, the application ought not to be considered separately from all or any of the reserved matters, they shall within the period of 1 month beginning with the receipt of the application notify the applicant that they are unable to determine it unless further details are submitted, specifying the further details they require.
- (3) Where layout is a reserved matter, the application for outline planning permission shall state the approximate location of buildings, routes and open spaces included in the development proposed.
- (4) Where scale is a reserved matter, the application for outline planning permission shall state the upper and lower limit for the height, width and length of each building included in the development proposed.
- (5) Where access is a reserved matter, the application for outline planning permission shall state the area or areas where access points to the development proposed will be situated.

Turning to the residential areas concerns exist in respect of the significant scale and spread of this development. The Masterplan seeks to provide a number of dwellings to the north and south of the main spine road within the development, which spreads east to west within the application site. No details have been provided regarding the height, width and length of each building and therefore difficult to assess the scale of development. This approach would push the extent of the built form further south from the settlement boundary of south Godstone, resulting in an encroachment into the countryside.

For the reasons given above, it has not been demonstrated that the impact of the development on the character and context of the area would not result in localised harm to the character and appearance, which would be apparent in views from the Eastbourne Road and Tilburstow Hill Road contrary to Policies CSP 18 of the Core Strategy and DP7 of the Local Plan and the provisions of the NPPF 2024 as well as Development Management Procedure Order (2015).

Neighbouring Amenities

Paragraph 135 of the NPPF 2024 states:

Planning policies and decisions should ensure that developments: a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development; b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping; c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities); d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit; e) optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and f) create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.

Policy CSP18 of the Core Strategy advises that development must not significantly harm the amenities of the occupiers of neighbouring properties by reason of overlooking, overshadowing, visual intrusion, noise, traffic and any other adverse effect. Policy DP7 of the Local Plan: Part 2 has the same objectives of protecting neighbouring amenity embodied in criteria 6-9. The policy contains a minimum distance relating to new development and existing properties of 14m between principal windows of existing dwellings and the walls of new buildings without windows and 22m where habitable rooms of properties would be in direct alignment

As a result of the size of the site and the significant distance between various elements of the proposal and the adjoining occupiers it is not considered that the proposal would appear visually intrusive, nor would it result in a loss of privacy. The details of window positions and glazing types would follow as part of the reserved matters (appearance) and are capable of being secured via condition at that stage of the process if deemed necessary in neighbouring amenity terms.

Amenities of Future Occupiers

Any reserved matters application would be expected to comply with the requirements of the Technical housing standards – nationally described space standard 2015 which sets out requirements for the Gross Internal (floor) Area of new dwellings at a defined level of occupancy as well as floor areas and dimensions for key parts of the home, notably bedrooms, storage and floor to ceiling height. While not formally adopted by this Council it is a useful indicator of appropriate floor spaces.

Policy DP7 of the Detailed Policies 2014 states that new development will be granted when the following matters are addressed...*Environment:* The proposals provide a satisfactory environment for the occupiers of both the existing and new development...*Facilities:* The proposal provides appropriate facilities for individual and communal use including bicycle storage, amenity areas and garden areas (proportionate to the size of the residential units and appropriate for the intended occupiers); as well as facilities for the storage and collection of refuse and recycling materials which are designed and sited in accordance with current Council standards, avoiding adverse impacts on the street scene and the amenities of the proposed and existing properties

Given the size of the site and overall layout it is considered that any proposal that would come forward at the reserved matters stage could be designed to the satisfaction of the LPA.

Biodiversity and Ecology

Policy CSP17 of the Core Strategy 2014 states that development proposals should protect biodiversity and provide for the maintenance, enhancement, restoration and, if possible, expansion of biodiversity, by aiming to restore or create suitable semi-natural habitats and ecological networks to sustain wildlife in accordance with the aims of the Surrey Biodiversity Action Plan. (34) The Council will seek to enhance biodiversity by supporting the work of the Downlands Countryside Management Project and by supporting Local Nature Reserves and Community Wildlife Areas.

Policy DP19 of the Detailed Policies 2014 states, there will be a presumption in favour of development proposals which seek to:

1. Protect, enhance or increase the provision of, and access to the network of multi-functional Green Infrastructure (GI)
2. Promote nature conservation and management
3. Restore or create Priority Habitats; or
4. Maximise opportunities for geological conservation.

B. In order to conserve and enhance the natural environment, proposals which would result in significant harm to local, national or statutory sites of biological or geological importance or the broader GI network will be refused planning permission unless:

1. All reasonable alternative locations with less harmful impacts are demonstrated to be unsuitable; and
2. The proposal incorporates measures to avoid the harmful impacts arising, sufficiently mitigate their effects, or, as a last resort, compensate for them.

C. Where a proposal is likely to result in direct or indirect harm to an irreplaceable environmental asset of the highest designation, such as a Site of Special Scientific Interest (SSSI), ancient woodland or veteran trees, the granting of planning permission will be wholly exceptional.

1. With regard to SSSIs, exceptions will only be made where benefits of development at the site clearly outweigh both the impacts on the features of the site and on any broader networks of SSSIs.
2. In the case of ancient woodland and veteran trees exceptions will only be made where the need for and benefits of the development in that location clearly outweigh the loss.
3. In all cases, any impacts or harm should not just be mitigated, but overall ecological benefits should be delivered.

D. Planning permission for development directly or indirectly affecting protected or Priority species will only be permitted where it can be demonstrated that the species involved will not be harmed or appropriate mitigation measures can be put in place.

Net gain: - The supporting ecological information and Biodiversity Metric indicate that proposed landscaping design will result in a decrease of 63.18% in habitat units and an increase of 25.53% in hedgerow units. The document further states that "*the loss of other neutral grassland and bramble scrub habitats is associated with unavoidable*

elements of the proposed development. There remain opportunities to improve against this level of performance, through off-site measures or through the purchase of biodiversity credits, which the Applicant could progress during detailed design. For instance, the conversion of 19.83 ha of off-site cropland to other neutral grassland in moderate condition would deliver a total net % change in habitat at 10.03 thus achieving the required 10% biodiversity net gain for the scheme.”

Paragraph 187 of the National Planning Policy Framework (NPPF) makes it clear that: “Planning policies and decisions should contribute to and enhance the natural and local environment by:

a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan)

b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland

c) maintaining the character of the undeveloped coast, while improving public access to it where appropriate

d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures and incorporating features which support priority or threatened species such as swifts, bats and hedgehog

e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans; and

f) remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate”.

Paragraph 192 requires the promotion of “the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity”.

It would appear that proposed landscaping and the net gain can be delivered if proposals are adhered to, and such matters are capable of being secured through condition.

NatureSpace have reviewed the application in respect of any implications for great crested newts and have confirmed that:

The development falls within the red impact risk zone for great crested newts. Impact risk zones have been derived through advanced modelling to create a species distribution map which predicts likely presence. In the red impact zone, there is highly suitable habitat and a high likelihood of great crested newt presence.

There are three ponds within 500m of the development proposal.

There is direct connectivity between the development and surrounding features in the landscape.

- Natural England Standing Advice guidance for local planning authorities advises that surveys on ponds up to 500m from development sites should be requested.

Ecological Information

The applicant has provided an ecological report, Ecological Impact Assessment, Temple (Ramboll), 01/07/2025. Within this report it states that:

There is suitable habitat on the development site, grassland, hedgerows and scrub. No waterbodies locally have been subject to suitability assessment or presence/likely absence surveys. Therefore, the presence or otherwise of great crested newt is not known locally.

Section 3.59 outlines an application will be made to join the District Licensing Scheme. Tandridge Council holds a District Licence, delivered by NatureSpace, which can be utilised providing an alternative to seasonally constrained surveys.

The scheme must be joined and documentation submitted to the local planning authority prior to determination to evidence that the proposed development is successfully addressing their great crested newt impacts.

We are not satisfied that the applicant has adequately demonstrated that there will no impact to great crested newts and/or their habitat as a result of the development being approved.

The Surrey Wildlife Trust has not provided their comments; however, looking through the information submitted it is considered that any issues arising would be resolved with additional information, conditions and the BNG would be part of the S106.

Subject to all of the above it is considered that the proposal is compliant with Policy CSP17 of the Core Strategy 2014, Policy DP19 of the Detailed Policies 2014 and guidance in the NPPF.

Trees

Policy CSP18 of the Core Strategy 2008 states that, The Council will require that new development, within town centres, built up areas, the villages and the countryside is of a high standard of design that must reflect and respect the character, setting and local context, including those features that contribute to local distinctiveness. Development must also have regard to the topography of the site, important trees or groups of trees and other important features that need to be retained.

Policy DP7 of the Tandridge Local Plan Detailed Policies 2014 states that where trees are present on a proposed development site, a landscaping scheme should be submitted alongside the planning application which makes provision for the retention of existing trees that are important by virtue of their significance within the local landscape. Their significance may be as a result of their size, form and maturity, or because they are rare or unusual. Younger trees that have the potential to add significant value to the landscape character in the future should also be retained where possible. Their retention should be reflected in the proposed development layout, allowing sufficient space for new and young trees to grow to maturity, both above and below ground. Where existing trees are felled prior to permission for development

being sought, the Council may require replacement planting as part of any permission granted.

The application has been accompanied by an Arboricultural Assessment which concludes that:

Assessment has concluded that tree removals associated with the design proposals are minor, with the majority of all category A and B trees identified for priority retention and protection and only a small area of localised removals required within category B tree group, G3. The implementation of a robust tree protection strategy as outlined above, based on the placement of fixed, braced tree protection fencing, will ensure safe retention of the retained high quality, high amenity value trees on the site. The unavoidable tree removals will be adequately compensated for by replanting and landscaping proposals (provided by others).

Overall, the development proposal is not considered to conflict with the general requirements of Policy CSP18 of the Core Strategy and Policy DP7 of the Tandridge Local Plan and would be acceptable in terms of tree issues.

Flooding/Drainage

Paragraph 171 of the NPPF 2024 states that, strategic policies should be informed by a strategic flood risk assessment and should manage flood risk from all sources. They should consider cumulative impacts on, or affecting, local areas susceptible to flooding, and take account of advice from the Environment Agency and other relevant flood risk management authorities, such as lead local flood authorities and internal drainage boards.

Paragraph 181 of the Framework states that when determining any planning applications, local planning authorities should ensure that flood risk is not increased elsewhere. Paragraph 182 goes on to say that:

Applications which could affect drainage on or around the site should incorporate sustainable drainage systems to control flow rates and reduce volumes of runoff, and which are proportionate to the nature and scale of the proposal. These should provide multifunctional benefits wherever possible, through facilitating improvements in water quality and biodiversity, as well as benefits for amenity. Sustainable drainage systems provided as part of proposals for major development should:

- a) take account of advice from the Lead Local Flood Authority
- b) have appropriate proposed minimum operational standards; and
- c) have maintenance arrangements in place to ensure an acceptable standard of operation for the lifetime of the development.

Policy DP21 of the Detailed Policies 2014 states that, water will be retained in the natural environment as far as possible. Proposals which seek to restore natural flows in the river systems or re-establish areas of functional floodplain will be supported, particularly where they would provide opportunities for recreation, habitat restoration/enhancement or additional Green Infrastructure provision. *Water Quality, Ecology and Hydromorphology*

Proposals should avoid damage to Groundwater Source Protection Zones, having regard to the Environment Agency's 'Groundwater Protection: Policy and Practice' guidance or successor documents

Development adjacent to or likely to affect underground or surface water bodies covered by the Water Framework Directive and Thames River Basin Management Plan should, where possible, make improvements to the quality, ecology and hydromorphology of these water bodies. Additionally, such proposals should contribute towards the maintenance or achievement of 'Good Ecological Status' for the affected water bodies. This may take the form of on-site measures or a financial contribution to off-site measures.

Proposals should seek to secure opportunities to reduce both the cause and impact of flooding; for example, through the use of Green Infrastructure for flood storage and, where necessary, the incorporation of Sustainable Drainage Systems (SuDS) suitable to the scale and type of the development, ensuring the discharge of surface run off is restricted to that of the pre-development site. Consideration should be given as to the future maintenance of any proposed SuDS schemes.

Development within Flood Risk Zones 2 and 3 or on sites of 1 hectare or greater in Zone 1, and sites at medium or high risk from other sources of flooding as identified by the Council's Strategic Flood Risk Assessment, will only be permitted where:

1. The sequential and, where appropriate, exception tests as detailed in 'Technical Guidance to the National Planning Policy Framework' have been applied and passed and the proposal is a development form compatible with the level of risk;
2. For all sources of flood risk, it can be demonstrated through a site-specific Flood Risk Assessment (FRA)* that the proposal would, where practicable, reduce flood risk both to and from the development or at least be risk neutral; and
3. Appropriate flood resilient and resistant design, and mitigation and adaptation measures are included in order to reduce any level of risk identified through a site-specific FRA to acceptable levels.

** The FRA should demonstrate how flood risk is to be mitigated, development adapted and, where practicable, risk reduced including the consideration of risks from other sources where appropriate. The content and scope of the FRA should be commensurate with the scale of development and be agreed by the District Council in consultation with the Environment Agency*

The site is located mainly within a Flood Risk Zone 1 area with a small part in a Flood Risk Zone 2 area and is not considered to be at risk of fluvial flooding.

Given its site area (c 9.34 ha), a site-specific Flood Risk Assessment is required by the NPPF. It is noted that a Flood Risk Assessment and Drainage Strategy has been submitted with the application

Consultations have been carried out with the Lead Local Flood Authority, and the following comments have been received:

The Lead Local Flood Authority have confirmed that:

The applicant has provided sufficient information to address our previous comments. We are satisfied that the proposed surface water drainage scheme meets the requirements set out in the aforementioned documents and are content with the development proposed, subject to our advice below and should planning permission be forthcoming the following conditions should be attached:

1) *The development hereby permitted shall not commence until details of the final design of a surface water drainage scheme have been submitted to and approved in writing by the planning authority. The final solution should follow the principles set out in the approved drainage strategy. The design must be compliant with the National standards for sustainable drainage systems and the NPPF. The required drainage details shall include:*

- a) Evidence that the proposed final solution will effectively manage the 1 in 30 (+35% allowance for climate change) & 1 in 100 (+45%) allowance for climate change) storm events and 10% allowance for urban creep. Associated discharge rates and storage volumes shall be provided using a maximum discharge rate equivalent to 7.1l/s/ha.*
- b) Evidence that the surface water drainage system meets the management of everyday rainfall (interception) requirements of the National Standards.*
- c) Detailed design drawings for all sustainable drainage elements including cross sections and detailed drainage layout plan.*
- d) An exceedance flow routing plan demonstrating no increase in surface water flood risk on or off site. The plan must include proposed levels and flow directions.*
- e) Details of drainage management responsibilities and maintenance regimes for all drainage elements.*
- f) Details of how surface water will be managed during construction including measures to protect on site and downstream systems prior to the final drainage system being operational. Including details of how existing watercourse on and adjacent to the site will be protected.*

Reason: *To ensure the design meets the national standards for SuDS and the final drainage design does not increase flood risk on or off site.*

2) *Prior to the first occupation of the development, a verification report must be submitted to and approved by the Local Planning Authority. This must demonstrate that the surface water drainage system has been constructed as per the agreed scheme (or detail any minor variations), confirming any defects have been rectified. Provide the details of any management company. Provide an 'As-Built' drainage layout and state the national grid reference of key drainage elements.*

Reason: *To ensure the Drainage System is designed to the national standards for SuDS.*

The Environment Agency have commented that they have no comment on the application. In addition to the above, The Upper Medway Internal Drainage Board have commented that the water runoff from the site will eventually discharge into their assets and therefore consent will be required from them by the developers.

Overall, the proposal is not considered to raise any significant flood risk or drainage issues and would be generally in compliance with the requirements of Policy DP21 of the Tandridge Local Plan and the NPPF subject to the imposition of appropriate conditions as specified by the Environment Agency and the Lead Local Flood Authority

Heritage

Policy DP20 of the Detailed Policies 2014 states, there will be a presumption in favour of development proposals which seek to protect, preserve and wherever possible enhance the historic interest, cultural value, architectural character, visual appearance and setting of the district's heritage assets and historic environment. Accordingly:

1. Only where the public benefits of a proposal significantly outweigh the harm to, or loss of a designated heritage asset or its setting, will exceptional planning consent be granted. These benefits will be proportional to the significance of the asset and to the level of harm or loss proposed.

2. Where a proposal is likely to result in substantial harm to, or loss of, a designated heritage asset of the highest significance (i.e. scheduled monuments, grade I and grade II* listed buildings, and grade I and grade II* registered parks and gardens), granting of permission or consent will be wholly exceptional.

In all cases the applicant will be expected to demonstrate that:

1. All reasonable efforts have been made to either sustain the existing use, find viable alternative uses, or mitigate the extent of the harm to the asset; and
2. Where relevant the works are the minimum necessary to meet other legislative requirements.

With the granting of permission or consent the Council will require that:

1. The works are sympathetic to the heritage asset and/or its setting in terms of quality of design and layout (scale, form, bulk, height, character and features) and materials (colour and texture); and
2. In the case of a Conservation Area, the development conserves or enhances the character of the area and its setting, including protecting any existing views into or out of the area where appropriate

Any proposal or application which is considered likely to affect a County Site of Archaeological Importance, or an Area of High Archaeological Potential (AHAP) or is for a site larger than 0.4 hectares located outside these areas, must be accompanied by an archaeological desk-top assessment. Where the assessment indicates the possibility of significant archaeological remains on the site, or where archaeological deposits are evident below ground or on the surface, further archaeological work will be required. Evidence should be recorded to enhance understanding and where possible material should be preserved in-situ. In cases where the preservation of remains in-situ is not possible, a full archaeological investigation in accordance with a Council approved scheme of work will be required; the results of which should be made available for display at the East Surrey Museum or other suitable agreed location.

The County Archaeologist was consulted on the proposed development and commented as follows:

In line with the requirements of the National Planning Policy Framework (para 207), and Local Plan policy DP20, for developments above 0.4ha, the applicant has considered the archaeological implications of the proposed development and has submitted an Heritage Impact Assessment that presents the results of an archaeological desk-based assessment (the Assessment), dated July 2025, as produced by their archaeological consultants Headland Archaeology (UK) Limited.

The Assessment records the presence of Laghman Park and its enclosing park pale within its Study Area. The park pale is a largely extant, medieval ditch and bank earthwork that enclosed an area of land to form a hunting and/or landscaped park surrounding the medieval moated manor house of Laghman Manor. The Assessment describes the park pale as a well preserved, upstanding, medieval landscape feature of local and regional significance. The park pale is a non-designated Heritage Asset and a Local Authority-defined Area of High Archaeological Potential.

An area of Laghman Park and its associated park pale is present within the east section of the Proposed Development Area (PDA). The significance of Laghman Park and its park pale primarily stem from their archaeological interest, however, they provide a

setting and context to the Grade II Listed Lagham Manor and its moated site (a Scheduled Monument) to the east of the PDA.*

The western boundary of the PDA is formed by Tilburstow Hill Road, the known route of the London to Portslade (Brighton) Roman road, and a Local Authority-defined Area of High Archaeological Potential. Consequently, the Assessment considers there to be a moderate to high potential for Heritage Assets of archaeological significance relating the medieval and Roman periods to be present in the PDA.

The proposed development layout shows that the construction of the main access road through the development will directly impact the park pale earthwork. When considering a direct impact on a non-designated Heritage Asset the National Planning Policy Framework (NPPF) state:

216. The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.

218. Local planning authorities should require developers to record and advance understanding of the significance of any heritage assets to be lost (wholly or in part) in a manner proportionate to their importance and the impact, and to make this evidence (and any archive generated) publicly accessible

The groundworks associated with the proposed development will directly impact the park pale earthwork and will have a severe and widespread impact across the rest of the PDA that will destroy any Heritage Assets of archaeological significance that may be present. As such, in accordance with the requirements of Local Plan policy DP20 and the NPPF (paras 207, 208, 216 & 218), further archaeological work is required.

The initial phase of archaeological work should comprise; an earthwork survey of the full extent of the park pale that lies within the PDA, to provide baseline data to inform its archaeological excavation prior to its partial destruction, and to inform its preservation and ongoing management within the proposed scheme; a site-wide programme of geophysical survey, with the aim of identifying and recording any features of possible archaeological origin; a subsequent trial trench evaluation, to determine the location, date, condition, depth and significance of any archaeological Heritage Assets that may be present, enabling suitable mitigation measures to be determined. Further mitigation measures may involve the more detailed excavation of any Heritage Assets found to be present and/or the monitoring of the development groundworks as they proceed.

In this instance, given the assessed potential of the site and the potential to preserve most of the park pale that is extant within the proposed development, it is acceptable and proportionate for these initial phases of archaeological work to be secured by condition with their results submitted following the determination of the Outline application.

The results of the investigative archaeological work, including the trial trench evaluation, must be submitted with any subsequent Reserved Matters application for the site. This will allow the extent of the park pale earthwork to be better understood and to be suitably incorporated into the development plan. It will ensure that in the event of a find(s) of national significance, there exists the opportunity to further influence the design of the development to allow for their preservation in situ. The results of the investigations will also provide the applicant with a clearer understanding

of the potential programme implications and costs, should further archaeological mitigation measures be required.

The earthwork survey, geophysical survey and the archaeological evaluation will need to be defined by a Written Scheme(s) of Investigation that has been submitted to and approved in writing by the Local Planning Authority. To ensure the required archaeological work is secured satisfactorily, the following condition is appropriate and should be attached to any planning permission that may be granted

No development shall take place until the applicant, or their agents or successors in title, has secured the implementation of a programme of archaeological work, to be conducted in accordance with a written scheme of investigation which has been submitted to and approved, in writing, by the Local Planning Authority.

Reason: *To ensure the required archaeological work is secured satisfactorily.*

NOTE: *The proposed development is adjacent to, and within the setting of, the medieval moated site of Laghman Manor, a Scheduled Monument (SM No. 1012795). Historic England must be consulted on any application that has the potential to impact the fabric or setting of a Scheduled Monument.*

*The Inspector of Ancient Monuments for Surrey is: Iain.Bright@HistoricEngland.org.uk
My comments relate to archaeological matters only, any impact on the fabric or setting of a Listed Building are matters to be addressed by the Heritage Conservation Officer who advises the Planning Authority on the Built Historic Environment.*

The County Historic Environment officer was consulted and commented as follows:

The header shows that the historic environment considerations are the character of the listed building as one of special architectural or historic interest. Special regard must be had to preserving the building or its setting in the determination of the application in accordance with section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990.

The applicant has provided a heritage statement in line with paragraph 207 of the NPPF. In line with paragraph 208, I have provided further comments below.

The application site is within 200m of the Laghman Manor medieval moated site complex. This comprises of the Scheduled Monument formed by a moat and earthwork. The desk-based assessment concludes this dates to some point after 1262 when Roger de St John obtained a licence to crenellate his house. Within the site are the Grade II listed Laghman Manor and the Grade II listed Brew House, Stable and Oast House. The current house will have replaced an earlier building and is listed as dating to the 16th century with a 17th century re-fronting. The Brew House, Stable and Oast House provide important context for the building and suggest a later farmstead use. Overall, the significance of the building and site stems from its status as a particularly early aristocratic residence which was subsequently rebuilt in the 16th century and subsequently altered in response to the changing needs of the owners.*

During the 14th century a deer park was enclosed around the manor house, part of which is within the application site. This represents a direct association between the site and the built heritage assets. I will leave Historic England to consider whether there is a sufficient enough link to decide whether the application site contributes to the setting of the monument.

In terms of the listed buildings, I am in agreement with the consultants that these are heavily screened from the site by the surrounding woodland and furthermore are

separated by the A22. I also agree with the conclusion that the fragmentary nature of the modern landscape restricts the ability to appreciate the deer park from the house and its outbuildings. As such, I do not consider the application site to make a contribution to the significance of the listed buildings.

I have assessed the proposal in accordance with paragraphs 208 and 212 of the NPPF. Owing to the degree of physical separation between the listed buildings and the application site, I do not consider the application site to make any contribution to their significance. On this basis I am not of the opinion there is any harm from the scheme to the built heritage assets.

Impacts upon aviation

Paragraph 111 of the NPPF 2024 states under subsection f) that planning policies should recognise the importance of maintaining a national network of general aviation airfields, and their need to adapt and change over time – taking into account their economic value in serving business, leisure, training and emergency service needs, and the Government's General Aviation Strategy

Policy CSP16 of the Core Strategy 2008 states, the Council will seek to minimise the impact of Gatwick Airport by working with BAA Gatwick, Crawley Borough Council and adjoining local authorities on the development of the airport up to the projected 45 million passengers per annum within the agreed limits of a single runway/two terminal airport. New off-airport parking and extensions to existing sites will be considered in the light of Green Belt policy and the need to minimise the use of the private car to travel to the airport.

Gatwick Airport Limited – Aerodrome Safeguarding were consulted and commented as follows - The proposed development has been examined from an aerodrome safeguarding perspective and could conflict with safeguarding criteria unless any planning permission granted is subject to condition in regard to the submission of SuDS details as follows:

Development shall not commence until details of the Sustainable Urban Drainage Schemes (SuDS) have been submitted to and approved in writing by the LPA. The scheme shall be implemented as approved

Reason – *To avoid endangering the safe movement of aircraft and the operation of London Gatwick through the attraction of Birds and an increase in the bird hazard risk of the application site.*

No objections are therefore raised with aerodrome safeguarding. If minded to approve the condition can be imposed as requested

Highways implications and safety

Policy CSP12 of the Core Strategy 2008 states that when managing travel demand the Council will require new development to:

- Make improvements, where appropriate, to the existing infrastructure network, including road and rail, facilities for bus users, pedestrians and cyclists and those with reduced mobility.
- Have regard to adopted highway design standards and vehicle and other parking standards.

Policy DP5 of the Detailed Policies 2014 relates to highway safety and design and states that, development will be permitted subject to meeting the requirements of all other appropriate Development Plan policies and where the proposal:

1. Complies with the relevant Highway Authority's and any other highways design guidance
2. Does not unnecessarily impede the free flow of traffic on the existing network or create hazards to that traffic and other road users
3. Retains or enhances existing footpaths and cycleway links
4. Provides safe and suitable access to the site which is achievable by all and promotes access by public transport, foot and bicycle to nearby residential, commercial, retail, educational, leisure and recreational areas where appropriate; and
5. Fully funds where appropriate or contributes towards the costs of any measures required to cost effectively mitigate the significant impacts arising from the development.

In accordance with the Council's Local Validation Requirements and national guidance, all development proposals that generate significant amounts of movement should be supported by a Travel Plan and either a Transport Statement or Transport Assessment (proportionate to the scale of the proposed scheme and extent of the transport implications), both of which should be submitted alongside the planning application.

The County Highways Authority were consulted on a number of occasions however, the latest response dated **2nd February 2026** is as follows:

The proposed development has been considered by THE COUNTY HIGHWAY AUTHORITY (CHA) who has assessed the application on safety, capacity and policy grounds and recommends the proposal be refused on the grounds that:

1. The Applicant has failed to demonstrate that adequate provision could be made in terms of sustainable modes of transport, thereby representing car dependant development contrary to the requirements of the National Planning Policy Framework (NPPF) 2024, in particular paragraphs 115 and 117, contrary to the objectives of the Surrey Local Transport Plan 4 (LTP4) and contrary to policy DP5 of the Tandridge Local Plan.

2. The Applicant has failed to demonstrate that safe access could be provided to the site for all users, representing a material risk of unacceptable detriments to the safe operation of the public highway contrary to paragraph 116 of the NPPF 2024, contrary to the objectives of the Surrey LTP4 and contrary to policy DP5 of the Tandridge Local Plan.

Further comments were made in regard to:

Sustainability

The details provided with the application lack certainty around what will be provided in terms of rail access. It is noted that the applicant proposes two options to achieve this; lift access between the northern and southern platforms via a bridge or ramp access from the south, as stated in the letter addressed to Network Rail dated 14 November 2025. However, neither of these options are explored in detail. Please also note that this rail service in terms of onward connectivity and frequency is very limited.

The proposals also lack suitable pedestrian and cycle connections to bus stops particularly on the A22 due to constraints under the bridge. It should also be noted that

the bus services are infrequent and limited, and the development lacks any bus priority, this is contrary to the sustainable transport aims of the NPPF 2024.

The lack of sufficient pedestrian infrastructure, in the context of the high vehicle speeds, represents a material risk to road safety due to the potential for conflict between motor vehicles and pedestrians and fails to meet the requirements for accessibility. For this reason, the proposals are considered to conflict with the requirements of the National Planning Policy Framework 2024 paragraph 117 parts a, b and c, which require the following:

a) give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and second – so far as possible – to facilitating access to high quality public transport, with layouts that maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use

b) address the needs of people with disabilities and reduced mobility in relation to all modes of transport

c) create places that are safe, secure and attractive – which minimise the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to local character and design standards

It should also be noted that this location scores a very low rating on the new Department for Transport Connectivity Tool, with a score of 44. This represents the site being approximately in the bottom 15th percentile for connectivity across England and Wales.

Road safety

Residents of the proposed development would be at a risk of conflict with fast moving vehicles on a busy road (the A22/ Eastbourne Road) if they choose to walk, particularly, due to the constraints under the bridge as previously mentioned. There is also a road safety concern associated with the risk of vehicles striking the bridge, it was recommended that National Railway are consulted about this, however, there does not seem to be any commentary from them regarding this matter.

The proposals are not LTN1/20 compliant and lack suitable cycle infrastructure to bus stops and essential day-to-day facilities, and as mentioned above, Eastbourne Road is a busy road with relatively high speeds which is not conducive to active travel, as such the proposals represent an unacceptable risk to the safe operation of the public highway.

It is recognised that the Applicant has proposed a number of improvements aimed at increasing the use of sustainable modes of travel however these measures are not considered sufficient to provide a meaningful choice of travel modes or any material shift in the modes of travel used by residents for the reasons explained above. Therefore, and for the reasons previously stated, the CHA is of the view that the proposals should be refused on the grounds of transport sustainability, accessibility and pedestrian and cycle safety, as they would result in severe cumulative impacts on the public highway, with reference to the NPPF 2024 paragraph 116.

Officer comment – It is noted that, although further discussions have taken place since, these latest issues and concerns were raised by the Highways Authority they have not been resolved.

Other matters

Godstone Parish Neighbourhood Plan

Godstone Parish Council is preparing a Neighbourhood Plan. The Regulation 14 pre-submission consultation took place between December 2024 and February 2025. The emerging Neighbourhood Plan is at an early stage and therefore carries limited weight. Nevertheless, it is a material consideration insofar as it indicates emerging local priorities and is supported by local evidence, including the Godstone Housing Needs Assessment.

The proposal engages a number of emerging Neighbourhood Plan matters, including sustainable development, meeting local housing needs, biodiversity, and sustainable travel. The proposed affordable housing provision, pedestrian and cycle improvements, and commercial/community unit would align positively with some of these emerging objectives.

However, the emerging Neighbourhood Plan does not allocate the site for development and does not establish the release of this land from the Green Belt. The proposal would therefore still represent a substantial residential-led expansion of South Godstone into open countryside outside the defined settlement boundary. In this respect, the proposal does not sit comfortably with a plan-led approach to growth and would pre-empt decisions that should properly be made through the Local Plan process.

Accordingly, while only limited weight can be attached to the emerging Neighbourhood Plan at this stage, the proposal gives rise to conflict with the emerging spatial approach insofar as it would bring forward a large unallocated Green Belt site outside the settlement boundary.

Renewable energy – Any reserved matters would be expected to demonstrate that the proposed development is capable of providing a 20% reduction of carbon dioxide on site and as such would comply with Policies CSP14 of the Core Strategy 2008. As this application is for outline consent only in relation to access such details would be secured at the reserved matters stage.

The applicant intends to upgrade parts of the network to allow cycling. We would need to understand what legal mechanism is to be used to facilitate this prior to any changes being made. Additionally, we would want to see design details of any proposals to allow full comment. We would expect the developer to fund any upgrades and would seek a commuted sum for future maintenance. The expectation would be that this would be included in any Highways s278 agreement.

Very Special Circumstances

The Applicant has put forward what they consider to comprise very special circumstances in Section 7 of their Planning Statement. The benefits identified, including housing delivery, affordable housing, infrastructure, open space and a commercial/community unit, are acknowledged as being important but clearly do not outweigh the Green Belt harm and other identified policy conflicts. This is particularly the case where the scheme also fails to satisfy paragraph 155(c) and is subject to an outstanding Highway Authority objection.

Planning Balance and Conclusion

The application has been assessed against the Development Plan as a whole, alongside relevant national policy and other material considerations. This includes the

Tandridge District Core Strategy, the Detailed Policies Local Plan, the Interim Policy Statement for Housing Delivery, the emerging Godstone Parish Neighbourhood Plan and the National Planning Policy Framework.

It is acknowledged that the Council is currently unable to demonstrate a five-year housing land supply. The presumption in favour of sustainable development is therefore engaged. In this context, the delivery of up to 200 dwellings, including 49% affordable housing, attracts positive weight.

The proposal would also provide a commercial/community unit, green infrastructure, public open space and biodiversity measures. These matters weigh in favour of the scheme, subject to appropriate securing mechanisms through conditions and planning obligations.

However, those benefits must be weighed against the identified Development Plan conflicts, Green Belt harm and highway objections.

The site lies outside the defined settlement boundary and within the Green Belt. South Godstone is a lower-order settlement and is not one of the district's principal Category 1 settlements. The proposal would therefore represent a substantial residential-led expansion of a lower-order settlement into open countryside and would conflict with the spatial strategy established by Policy CSP1.

In Green Belt terms, the Council is currently undertaking a comprehensive Green Belt Review to determine potential grey belt sites and whilst the site may possibly be capable of being treated as Grey Belt in definitional terms because it is unlikely to strongly contribute to purposes (a), (b) or (d) of paragraph 143 of the NPPF, paragraph 155(a) requires more than this. It must also be demonstrated that the development would not fundamentally undermine the purposes, taken together, of the remaining Green Belt across the area of the plan.

In addition, and materially, the proposal fails to satisfy paragraph 155(c) of the NPPF. The County Highway Authority has recommended refusal on the basis that the applicant has failed to demonstrate adequate provision for sustainable modes of transport and has failed to demonstrate safe access for all users. The Highway Authority considers that the proposal would result in car-dependent development and would give rise to unacceptable highway safety concerns. It also identifies limited rail frequency and onward connectivity, uncertainty around rail access improvements, inadequate pedestrian and cycle links to bus stops, infrequent and limited bus services, no bus priority, a very low DfT Connectivity Tool score, and safety concerns associated with pedestrians and cyclists using the A22.

These matters directly undermine the applicant's assertion that the site is sustainably located. The test under paragraph 155(c) is not met. The proposal must demonstrate that the location is sustainable, with particular reference to the NPPF requirements to prioritise sustainable transport, provide safe and suitable access for all users, and offer a genuine choice of transport modes. On the basis of the Highway Authority's objection, this has not been demonstrated.

As paragraph 155 requires all criteria to be met, the failure to satisfy both criterion (a) and criterion (c) is determinative. The proposal does not benefit from the Grey Belt route to being treated as not inappropriate development. It therefore constitutes inappropriate development in the Green Belt, to which substantial weight must be given.

The proposal also conflicts with the Interim Policy Statement for Housing Delivery. It is not previously developed land, is not an allocated site, is not limited infilling, and is not a rural exception scheme. It is a large, speculative residential-led proposal on open Green Belt land outside the settlement boundary.

Flood risk and surface water drainage do not currently provide a reason in themselves to oppose the proposal, subject to the LLFA's recommended conditions and any Environment Agency comments on fluvial flood risk.

The benefits of the proposals need to be weighed against the harm that development would cause. The proposal would result in inappropriate development in the Green Belt, significant encroachment into the countryside, loss of openness, conflict with the spatial strategy, conflict with the Interim Policy Statement for Housing Delivery, and conflict with highway and sustainable transport policy. The Highway Authority's objection adds significant further weight against the proposal because it demonstrates that the development would not be sustainably located and would not provide safe and suitable access for all users.

Furthermore, whilst the applicants have put forward what they consider to constitute very special circumstances, the benefits identified, including housing delivery, affordable housing, infrastructure, open space and a commercial/community unit, are important but do not clearly outweigh the Green Belt harm and other identified policy conflicts. This is particularly the case where the scheme also fails to satisfy paragraph 155(c) and is subject to an outstanding Highway Authority objection.

The recommendation is made in light of the National Planning Policy Framework (NPPF) and the Government's Planning Practice Guidance (PPG). It is considered that in respect of the assessment of this application significant weight has been given to policies within the Council's Core Strategy 2008 and the Tandridge Local Plan: Part 2 – Detailed Policies 2014 in accordance with the NPPF 2023. Due regard as a material consideration has been given to the NPPF and PPG in reaching this recommendation.

All other material considerations, including third party comments, have been considered but none are considered sufficient to change the recommendation.

RECOMMENDATION:

REFUSE

Reasons

1. The proposal represents inappropriate development in the Green Belt that would result in significant harm to openness both spatially and visually. The proposal would not comply with the requirements of paragraphs 143, 154 and 156 of the NPPF 2024. The site has also been considered against paragraph 155; however, the proposal would fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan. It would fail to safeguard the open countryside from encroachment. Very special circumstances do not exist to override the very substantial weight that must be afforded to the harm to the Green Belt and to the character of the area. Accordingly, no very special circumstances exist, either individually or cumulatively, to clearly outweigh the harm by reasons of inappropriateness and other identified harm. As such, the proposal is contrary to the provisions of Policies DP10 and DP13 of the Tandridge Local Plan Part 2: Detailed Policies and the provisions of the National Planning Policy Framework (2024) as a whole.
2. The site is located in an unsustainable location with limited active travel opportunities, and where the only realistic means of transport to everyday amenities would be the

private car. This is contrary to the aims of the National Planning Policy Framework 2024 (NPPF), in particular paragraph 117, the Surrey Local Transport Plan 4 (LTP4) and the Tandridge Local Plan Policy DP5 A.4

3. The Applicant has failed to demonstrate that adequate provision could be made in terms of sustainable modes of transport, thereby representing car dependant development contrary to the requirements of the National Planning Policy Framework (NPPF) 2024, in particular paragraphs 115 and 117, contrary to the objectives of the Surrey Local Transport Plan 4 (LTP4) and contrary to policy DP5 of the Tandridge Local Plan.
4. The Applicant has failed to demonstrate that safe access could be provided to the site for all users, representing a material risk of unacceptable detriments to the safe operation of the public highway contrary to paragraph 116 of the NPPF 2024, contrary to the objectives of the Surrey LTP4 and contrary to policy DP5 of the Tandridge Local Plan.

Informatives

1. The development has been assessed against Tandridge District Core Strategy 2008 – Policies CSP1, CSP2, CSP3, CSP4, CSP7, CSP8, CSP11, CSP12, CSP13, CSP14, CSP16, CSP17, CSP18, CSP19, CSP21, CSP22, Tandridge Local Plan: Part 2 – Detailed Policies 2014 – Policies DP1, DP4, DP5, DP7, DP9, DP10, DP13, DP18, DP19, DP20, DP21, DP22, and material considerations. It has been concluded that the development would constitute inappropriate development in the Green Belt and that there are no very special circumstances that would outweigh that harm.
2. This decision relates to drawings numbered 332610171-STN-HGN-SW-DR-H-0004, 9042_APP01A, 9042_APP002_Masterplan, 9042_APP003_Parameter Plan_Land Use, 9042_APP004_Parameter Plan_Density and Scale, 9042_APP005_Parameter Plan_Access and Open Space, 9042_APP_Site Level Plans, 9042_APP007_Site Cross Sections received 8th July 2025
3. The Local Planning Authority has acted in a positive and proactive way in determining this application, as required by the NPPF (2024), and has assessed the proposal against all material considerations including the presumption in favour of sustainable development and that which improves the economic, social and environmental conditions of the area, planning policies and guidance and representations received.

	Signed	Dated
Case Officer	DV	06/05/2026
Checked ENF		
Final Check	PL	08.05.2026