LAND AT LAMBS BUSINESS PARK, SOUTH GODSTONE

Site Specific Green Belt Assessment

Prepared by LRM Planning Limited on behalf of WT Lamb
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Appendix 1 – Site Location Plan
1 Introduction

1.1 This Site Specific Green Belt Assessment has been prepared on behalf of WT Lamb, in support of the Development Plan promotion of land at Lambs Business Park, South Godstone, to accommodate two data centres, a renewable biofuel production plant, a combined cycle energy centre and the redevelopment of underutilised areas of the existing Business Park to accommodate higher value and more productive uses. Further information on the proposed development is contained within the accompanying Development Framework Document. The proposed development is located on a site that is currently situated within the Metropolitan Green Belt.

1.2 As indicated within national planning policy, the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open. The essential characteristics of Green Belts are their openness and their permanence. The primary function for the Metropolitan Green Belt is to provide a stretch of mainly open country as near to London as possible, to act as a barrier against the further spread of built development and to provide an area in which people are able to find recreation and enjoyment.\(^1\)

1.3 Notwithstanding the above, national planning policy does permit, where exceptional circumstances exist, for Green Belt boundaries to be altered through the preparation or a review of a Local Plan.

1.4 In the case of Tandridge District Council, the preparation of its new Local Plan provides an opportunity to review the existing boundaries of the Metropolitan Green Belt within the local authority area. Indeed, given the development pressures in Tandridge District, there is a demonstrable need to amend the boundaries of the Metropolitan Green Belt through this process.

1.5 This assessment has been undertaken using a methodology which focuses on the contribution that Lambs Business Park makes to the Metropolitan Green Belt within Tandridge District. It assesses the site’s contribution to meeting the fundamental aim and the five purposes of a Green Belt, as identified in national planning policy.

1.6 This Report demonstrates that the site makes little contribution to the Metropolitan Green Belt and could be developed in the manner envisaged without either constituting the urban sprawl which Green Belt policy seeks to prevent or harming the primary purpose of the Metropolitan Green Belt.

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\(^1\) Para. 2.14 of the Tandridge Local Plan Green Belt Assessment Methodology (2015)
2 Site Description

2.1 The site, identified at Appendix 1, comprises a parcel of land located approximately 1km to the west of South Godstone. It comprises a 13.4ha site and is located wholly within the Metropolitan Green Belt. It is divided into two distinct parcels as follows:

- **The eastern land parcel** is identified as a Strategic Employment Site within the current Development Plan for Tandridge District. There is a distinct difference in the age and the quality of the commercial units within the Business Park. Whilst units to the east and south are modern and meet commercial demands for such space, units to the north and west are largely buildings associated with the former brickworks. From 2018 these units will not satisfy EPC standards and therefore will not be capable of being let. In addition, regardless of the number of years remaining on the lease, WT Lamb will be unable to continue to let these buildings to an existing occupier from 1st April 2023. Accordingly, by 1st April 2023, these buildings will be vacant and redundant. The eastern parcel of land measures approximately 5.4ha; and

- **The western land parcel**, which lies outside the Strategic Employment Site designation, was historically used as a quarry with permission for clay extraction, inert landfill and the importation of aggregates via the rail siding. According to the planning permission, WT Lamb have until 2047 to restore the quarry back to its original condition. This part of the wider site measures some 8ha. Its current use for aggregate recycling and inert waste recovery use means that it currently does not make a contribution to the purposes of the Metropolitan Green Belt.

2.2 A 300m live railway siding located to the north of the quarry area is retained by WT Lamb. In addition to this, the main railway track operated by Network Rail has a further siding of 300m in length which is connected to WT Lamb’s privately-owned siding.

2.3 The site significantly slopes from the northwest towards the south and is bounded by:

- The Reading to Tonbridge Railway Line (including the Channel Tunnel Freight Line) to the north;
- Countryside, which is largely used for agriculture, to the south (although permission exists for the extraction of oil and gas – see Surrey County Council permission 2015/0170);
- Maple Wood and countryside, which is largely used for agricultural purposes, to the west; and
- Fields parcels and residential premises located on Terracotta Road (all of which are in the ownership of WT Lamb) and Ruston Avenue to the east.

2.4 The subject site is well screened by substantial boundary hedges to the west and south, which support a significant number of trees (please refer to the landscape section of the accompanying Development Framework Document). The boundaries to the north and northwest are formed and screened by Maple Wood and a heavily wooded railway embankment. As indicated above, the remaining land in the surrounding environs is open countryside and within agricultural use. Agricultural field boundaries therefore screen views into and out of the site.

2.5 An Area of Great Landscape Value is located to the north of the site, whilst a Site of Nature Conservation is located to the north and west (Maple Wood). Birchen Coppice to the south is a Potential Site of Nature Conservation Importance. Areas of high archaeological potential are located to the south west. These designations are all located outside Lambs Business Park.
3 Previous, Existing and Proposed Uses

Previous Uses

3.1 WT Lamb have controlled the site for over 100 years, having originally purchased the brickworks operations in 1918 to produce traditional roof tiles and bricks made from the local Weald clay, quarried in the site’s western land parcel. The works utilised its privately-owned railway siding to import coal and export bricks and tiles. Given the nature of the quarrying use, the site has been intensively used for industrial manufacturing purposes. The railway therefore has a strong association with the site’s former land uses.

3.2 Over more recent years, the demand for traditional tiles and bricks has lessened and the original brickworks buildings in the Strategic Employment Site have been reused for commercial purposes.

Existing Uses

3.3 The site benefits from several existing uses and extant planning permissions, which allow for continued operations.

3.4 The eastern land parcel, which is wholly located within the Metropolitan Green Belt, is identified as being a Strategic Employment Site within the Adopted Tandridge District Development Plan. As indicated in the previous section, there is a distinct difference in the age and quality of the commercial units within the Business Park, with the units to the east and south being more modern and having successfully met commercial demand for such space.

3.5 Units to the north and west of the Business Park are largely buildings associated with the former brickworks. By virtue of their EPC rating and the inability to viably refurbish the units up to the necessary standards, the vast majority of these units will, by 2023 at the very latest, be vacant and redundant.

3.6 The site also benefits from various extant planning permissions for:

- Manufacturing facing bricks and thermally treat clay products; and
- Development of an additional 1,920 sq.m of B1, B2 and B8 uses.

3.7 The western land parcel lies outside the Strategic Employment Site designation. It was historically used as a quarry for manufacturing bricks and tiles and benefits from the following current planning permissions:

- TA80/675 – The construction of a depot for handling resalable spent railway ballast and earth; repossessing; and the infill of the void; and
- TA99/155 – The extraction of clay for the manufacture of bricks until 2040 and the infill of the existing void utilising inert waste by 2047.

3.8 The 1999 planning application included the site subject of the 1980 planning application in its restorations provisions, under the terms of a Section 106 legal agreement. This established the deadline for the restoration of the site as 2047.

3.9 An Environment Agency (hereafter EA) Waste Recovery Permit (WRP) was granted to restore
the Phase 2 area in 2016. A WRP application to restore Phase 4 has recently been submitted to
the EA. A WRP application for Phase 3 will follow the restoration of Phases 2 and 4.

3.10 The recovery of silts and aggregates from the Phase 4 area is permitted under EA license
EPR/EB3107CQA001. This will ensure that the Phase 4 area is professionally prepared for the
receipt of inert waste and restoration material, once the WRP has been granted. Phase 1 has
already been restored.

3.11 Both the extant planning permissions, as well as the EA WRP, confirm the western portion of the
site’s current use, as an aggregates recycling and an inert waste recovery facility.

Proposed Uses

3.12 Several options for the future of the site have been previously considered by WT Lamb. Based
on the significant amount of technical and feasibility work, the favoured option is:

- A c.5,418sq.m combined cycle energy centre (up to 49MWe), incorporating a renewable
  biofuel production plant;
- 2 no. 9,245 sq.m data centres (over 2-3 storeys), with associated supplementary energy
  centres (decentralised CCGT);
- The intensification and the redevelopment of underutilised areas of the Business Park to
  provide higher-value and more productive employment opportunities;
- The use of the former pit areas for flood alleviation and as a nature reserve; and
- Education and learning opportunities to be explored.

3.13 As indicated in the accompanying Development Framework Document, WT Lamb seek the
development of an exemplar, market leading, sustainable technology park.

3.14 A summary of each of the proposed uses is provided below.

Data Centres

3.15 The data centres will house computer systems and associated infrastructure. Typically, a data
centre will house a large group of networked servers for the remote storage, processing and
distribution of personal and corporate electronic data. The data centres will be used to house air
handling units required to cool the facility, ICT equipment, ancillary batteries, electrical switch
gear, chilled water supplies and generators. Given the nature of the use, data centres are large
consumers of power.

The Combined Cycle Energy Centre

3.16 The combined cycle energy centre will be designed as a highly-efficient and decentralised
combined heat and power plant (hereafter CHP). It will be powered by either a conventional gas
connection, or a combination of gas from a conventional connection and from the consented gas
field to the south of Lambs Business Park.

3.17 Using a gas and a steam turbine, the energy centre will produce 49MWe and residual heat. The
production of this quantity of electricity will ensure that the power needs of the data centres
and the renewable biofuel production plant are met in full, from a decentralised source, without
the need for electricity to be provided from the National Grid. Moreover, any residual electricity
will be available to power existing or planned development in the surrounding areas, or it will be sent to the Grid.

3.18 Residual heat (up to 49MWth) produced from the CHP Plant could be used in a number of different ways, including:

- In the renewable biofuel production plant. The residual heat will dry refuse derived fuel (hereafter RDF), via either a water or an air heat exchanger; and / or
- Heat and cool the proposed data centres; and / or
- To heat and cool existing and planned developments in the surrounding area.

Renewable Biofuel Production Plant

3.19 The renewable biofuel production plant will utilise pre-sorted and bundles refuse derived fuel waste (hereafter RDF), imported to the site by rail by a third-party waste operator. WT Lamb are in discussions with a number of third-party waste operators, including the Day Group, who own several rail heads in the South East, with their nearest usable railheads being located within Woking and Salfords. The third-party operator will obtain pre-bundled and sorted RDF waste material to be supplied to their rail sidings for the onward transportation to WT Lamb’s rail siding at Lambs Business Park.

3.20 The renewable biofuel production plant will process 150,000 tonnes of waste per year. This will comprise pre-processed commercial and residual wastes.

3.21 The waste handled by the renewable biofuel production plant will be the residual product that is left after processing waste materials via traditional sorting methods, to extract elements that can be usefully recycled (for example metals, suitable grades of plastics and glass). These useful materials are consigned onwards to appropriate recycling facilities.

3.22 Ordinarily, the waste to be handled by the renewable biofuel production plant is unrecyclable and would be sent either to waste recovery facilities or to landfill. Instead, this process will see the waste being recycled to create a biofuel. The pelleted bio-fuel will be distributed via the railway network to end users, where it will be combusted or gasified at existing facilities to create renewable heat and power. Typical customers for the fuel will be the domestic and European cement, steel and coal fired power sectors.

3.23 The plant will contain a number of processing operations to upgrade the waste to a finished fuel product. All waste material will be supplied by a contract to an agreed specification and be processed to form a final fuel product that can be used as an alternative to conventional solid fuels, including coal. The production process shall include the following key stages:

- Initial acceptance and Quality Control;
- Shredding and separation;
- Screening and the removal of any conventional recyclable materials;
- Screening and the removal of contaminants;
- Drying including the use of 6-10MWth of residual heat from the CHP Plant;
- Milling and pelletising;
- Quality control and testing; and
- Onward transportation to end users by rail.
3.24 The reprocessing of waste within the renewable biofuel production plant constitutes a recycling operation and no waste will be combusted or gassified on Lambs Business Park. The waste will be handled at the highest possible point on the Waste Hierarchy.
4 Green Belt Historic and Planning Policy Context

Background

4.1 The first official proposal "to provide a reserve supply of public open spaces and of recreational areas and to establish a green belt or girdle of open space" was made by the Greater London Regional Planning Committee in 1935. Provision for Green Belts was included within the 1947 Town and Country Planning Act and allowed their inclusion in development plans for the first time.

4.2 In 1955, Ministerial Circular 42/55 introduced the concept of Green Belt purposes and the importance of defining clear boundaries. Only 3 purposes were introduced, which were:

- To check the growth of a large built up area;
- To prevent neighbouring towns merging; and
- To preserve the special character of a town.

4.3 Since the publication of the Ministerial Circular, various alterations to national planning policy relating to Green Belts have been made, with the latest iterations being provided within the National Planning Policy Framework (hereafter NPPF). Whilst we are aware that the NPPF has recently been updated, the emerging Tandridge Local Plan will be examined against the 2012 version of the NPPF, in accordance with the provisions provided by para. 214 of the 2019 version. In this context, a summary of national planning policy relating to Green Belts is provided below.

Green Belt Purposes

4.4 National Planning Policy in relation to Green Belt is outlined in Chapter 9 of the NPPF. It:

- Outlines the fundamental aim of Green Belt policy;
- Reaffirms the specific purposes of including land in Green Belt;
- Gives policy a more positive thrust by specifying objectives for the use of land in Green Belts;
- Confirms that Green Belts must be protected beyond the Plan period;
- Advises on defining boundaries and on safeguarding land for longer-term development needs; and
- Maintains the presumption against inappropriate development within Green Belts and refines the categories of appropriate development.

4.5 Paragraph 79 of the NPPF outlines that the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and permanence.

4.6 Paragraph 80 of the NPPF identifies five purposes for including land within the Green Belt. These include:

- To check the unrestricted sprawl of large built-up areas;
- To prevent neighbouring towns merging into one another;
- To assist safeguarding the countryside from encroachment;
- To preserve the setting and special character of historic towns; and
- To assist in urban regeneration by encouraging the recycling of derelict and other urban land.

**Defining Green Belt Boundaries**

4.7 Para. 83 of the NPPF states that once the general extent of the Green Belt has been established, it should only be altered in exceptional circumstances, through the review of the Local Plan.

4.8 When drawing up or reviewing Green Belt boundaries, local planning authorities should take account of the need to promote sustainable patterns of development. They should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt, or towards locations beyond the outer Green Belt boundary.

4.9 When defining boundaries, local planning authorities should:
- Ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development;
- Not include land which is unnecessary to keep permanently open;
- Where necessary, identify in their plans, areas of ‘safeguarded land’ between the urban area and the Green Belt, in order to meet longer-term development needs;
- Make clear that safeguarded land is not allocated at the present time;
- Satisfy themselves that Green Belt boundaries will not need to be altered at the end of the Development Plan period; and
- Define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.

**Inappropriate Development**

4.10 Para. 89 of the NPPF describes the construction of new buildings within the Green Belt as inappropriate development. The exceptions to this are buildings related to agriculture and forestry, outdoor sports, recreation and cemeteries, extensions and alterations to existing buildings, replacement buildings, limited infilling in villages and the limited infilling and partial or complete redevelopment of previously developed sites, where there would be no greater impact on the openness of the Green Belt and the purpose of including land within it, than the existing development.

4.11 Para. 91 outlines that elements of many renewable energy projects will comprise inappropriate development. In such cases, developers are required to demonstrate very special circumstances for the development to proceed. Very special circumstances will not exist unless the potential harm to the Green Belt and any other harm, is clearly outweighed by other considerations, including the wider environmental benefits associated with the increased production of energy from renewable sources.
4.12 The designation of the Metropolitan Green Belt within Surrey was first introduced as part of the 1958 Surrey Development Plan. The purpose for introducing the designation at that time was to create:

“...a stretch of mainly open country as near as possible to London, to act as a barrier against further outward spread of building development and to provide an area in which people now living in the overcrowded districts can find recreation and enjoyment” (Part 2, Paragraph 10).

4.13 The Green Belt boundary proposed through the 1958 Surrey Development Plan remained for a considerable period of time. For Tandridge District, the boundary was first adjusted in 1986. Since 1986, only minor amendments to the larger settlements within the District have been made and none since 2001. For South Godstone, its settlement boundaries have remained the same since the South of the Downs Local Plan 1986.

4.14 The Green Belt within Tandridge District forms part of the Metropolitan Green Belt which covers a substantial part of the South East and East of England Regions, surrounding London. Para. 2.2 of the Adopted Core Strategy states that about 94% of Tandridge District falls within the Metropolitan Green Belt.

4.15 Section 10 of the Tandridge Local Plan Part 2 Detailed Policies (2014) describes the role of the Metropolitan Green Belt within Tandridge. It states that within the District, the Green Belt is seen as:

- Being a vitally important policy for controlling urban development and to maintain the openness around settlements;
- Preventing the outward spread of London;
- Preventing the coalescence of settlements;
- To assist in promoting urban regeneration, by encouraging the re-use of land; and
- Providing opportunities for access to the countryside and for outdoor recreation.

4.16 It is acknowledged within the existing Development Plan that parts of the Green Belt suffer from neglect and the challenge will be to improve the quality and usefulness of these areas. The Local Plan supporting text also seeks to make the best use of previously developed land, particularly surplus commercial sites, in order to protect the Green Belt (Issue 1 of the Core Strategy refers).

4.17 In line with national planning policy, Policy DP10 of the Local Plan Part 2 states that planning permission for inappropriate development in the Green Belt will only be permitted where very special circumstances exist, to the extent that other considerations outweigh any potential harm to the Green Belt, and any other harm.

4.18 Policy DP13 provides the planning policy context for new buildings within the Green Belt. It states that unless very special circumstances can clearly be demonstrated, the Council will regard the construction of new buildings within the Green Belt as being inappropriate.
development. However, subject to other Development Plan policies, the relevant exceptions to this are *inter alia*.

“The limited infilling or partial or complete redevelopment of previously developed sites in the Green Belt, but outside the Defined Villages, whether vacant or in use, 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.”

4.19 The explanatory text to the policy (para. 13.6) states that:

“The Council has identified and supports the contained development of two Strategic Employment Sites which are brownfield sites in the Green Belt, outside the Defined Villages. These are Hobbs Industrial Estate and Lambs Business Park, which comprise a range of commercial and industrial uses. Also within the District there are other brownfield sites outside the Defined Villages that make a significant contribution to the rural economy of the District. The retention and further development of these important employment sites will also be encouraged within the constraints of Green Belt policy”.

4.20 In addition to the above, Supplementary Planning Guidance was adopted by Tandridge Council in relation to Lambs Business Park, in November 2004. The purpose of the Guidance was to provide the framework against which proposals for the limited infilling, or complete or partial redevelopment of the site would be assessed.

4.21 The main proposals outlined within the SPD were to demolish the majority of buildings associated with the former brickworks use, to convert the former dryer building into employment floorspace, to replace an existing commercial unit with a smaller building and to use the former brick stacking areas as open storage facilities.

4.22 The proposals established in the Development Brief would result in:

- The demolition of approximately 2,500sq.m of floorspace;
- The net reduction in site coverage of around 2,150sq.m of space;
- Just under 1,525sq.m of refurbished floorspace; and
- An increase just over 4,400sq.m of lettable compound areas.

**Local Planning Policy – Surrey County Council**

4.23 As part of the proposed scheme relates to a renewable biofuel production plant, the Waste Development Plan for Surrey County Council is relevant. The latest iteration was adopted in May 2008 and was subsequently amended by order of the High Court in March 2009.

4.24 Policy CW5 (Location of Waste Facilities) outlines that proposals for waste facilities on unallocated sites will be considered in accordance with the following criteria:

- Priority will be given to industrial / employment sites, particularly those in urban areas, and to other suitable urban sites and then to sites close to urban area and to sites easily accessible by the strategic road network;
- Priority will be given to previously developed land, contaminated, derelict or disturbed land, redundant agricultural buildings and their curtilages, mineral workings and land in waste management use, over greenfield land;
Areas of Outstanding Natural Beauty, Area of Great Landscape Value and sites with or close to international and national nature conservation designations should be avoided; and

The larger the scale of development and traffic generation, the more important is a location well served by the strategic road network, or accessibly by alternative means of transport.

4.25 Policy CW6 provides the planning policy framework for waste related development in the Green Belt. It states that there will be a presumption against inappropriate waste related development in the Green Belt except in very special circumstances. Very special circumstances to justify inappropriate development of waste management facilities in the Green Belt will not exist unless the harm, by reason of inappropriateness and any other harm, is outweighed by other considerations. Very special circumstances may include:

- The lack of suitable non-Green Belt sites;
- The need to find locations well related to the source of waste arisings;
- The characteristics of the site; and
- The wider environmental and economic benefits of sustainable waste management, including the need for a range of sites.

4.26 Surrey County Council has begun preparation of its new Waste Local Plan. The Surrey Waste Local Plan 2019-2033 was submitted for independent examination on 12th April 2019. The Examination Hearing Sessions will commence in September 2019. On adoption, the policy context for developing waste facilities in the Green Belt, including on the subject site, could alter.

4.27 As demonstrated in the accompanying Exceptional Circumstances Report, there is a significant need for new waste processing facilities within Surrey. The north western element of Lambs Business Park (i.e. the former quarry area) has been shortlisted in the emerging Waste Plan to accommodate new waste facilities (Policy 10 refers).

Other Green Belt Evidence

4.28 As part of the evidence base supporting the emerging Local Plan, the Council has undertaken a review of how land falling within the existing Metropolitan Green Belt serves the five purposes of the Green Belt. The Assessment is being undertaken in four stages as follows:

- Establishing a Green Belt Assessment Methodology – the document, which was published in 2015, establishes the Council’s approach to understanding how and the extent to which, land within the Green Belt within Tandridge is serving the Green Belt purposes;
- Green Belt Assessment Part 1 (2015) – The report provided a historic assessment of the Green Belt within the District; a high-level assessment of the Metropolitan Green Belt; and a detailed parcel assessment that considered 47 parcels within the designation;
- Green Belt Assessment Part 2 (2016) – The report provided an assessment of 54 areas worthy of further investigation as defined by the Part 1 Assessment; and
- Green Belt Assessment Part 3 (2018) – The report identifies which sites within Tandridge demonstrate the exceptional circumstances that could justify the release from the Green Belt.

4.29 A summary of the key points contained within each evidence-based document, relevant to Lambs Business Park, is provided below:
4.30 **Green Belt Assessment Methodology (2015):** As well as establishing a methodology for the Assessment, the Council’s Green Belt Assessment Methodology provides further information on the purpose, function and impact of the Metropolitan Green Belt within Tandridge District. Section 2 of the Report states that:

- Tandridge District has the highest percentage of Green Belt in the Country (94%);
- Green Belt policy has been successful in enabling the District to fend off extensive development and retain its rural nature; and
- The main feature of the Metropolitan Green Belt is its permanence and its continued protection must be maintained as far as can be seen ahead.

4.31 **Green Belt Assessment Part 1 (2015):** In line with the Green Belt Assessment Methodology, the Part 1 Assessment divided the Green Belt within Tandridge District into a parcels, using roads, railways and other physical features. Lambs Business Park was located within Parcel 031, which the Assessment found to be worthy of further investigation to understand whether it could be allocated in the Local Plan to help meet the District’s development needs. In relation to Parcel 031, Appendix D of the Part 1 Assessment concluded that:

> “Due to the parcel’s location far away from any settlement or urban area, it does not make any contribution to many of the Green Belt purposes associated with containing development from built up areas. However, the parcel is generally free from any significant concentration of development, and so is considered to play a strong role in safeguarding the countryside from encroachment. The industrial estate is recommended for further investigation due to the significant concentration of development present, and the encroachment on the countryside…”

4.32 Having undertaken the initial assessment, all the ‘areas for further investigation’ were assigned a new reference number. Lambs Business Park, which was identified as being Parcel 032. In respect of the Parcel, the Report concluded that:

> “The concentration of development at Lambs Business Park encroaches on the countryside, even though it was there prior to the Green Belt designation. As such, it has been identified as an area for further investigation” (page 24 refers).

4.33 **Green Belt Assessment Part 2 (2016):** In line with the conclusions of the Part 1 Assessment, Lambs Business Park was considered in more detail to understand whether it served purposes of a Green Belt.

The Council’s assessment concludes that by virtue of the scale of development on the subject site, its siting and existing uses, it is not considered to serve the Green Belt Purposes 1, 2 and 4. Specifically, the Assessment concludes that:

> “Overall, it is concluded that the Area does not serve the purposes of including land within the Green Belt, given its siting, the scale of development and existing employment use. Whilst the Area for Further Investigation is located within the countryside, the Business Park is a Strategic Employment Site with a quarry located on the western edge of the site outside the boundaries of the strategic employment designation, and as such is not considered to safeguard the countryside from encroachment. Its highly developed appearance compromises the open character of the Green Belt in this location. Although the site is self-contained and has limited visual impact, it is considered that it should be considered further as part of the Green Belt Assessment in terms of whether or not exceptional circumstances exist” (page 24 refers).
4.34 **Green Belt Assessment Part 3:** Given the conclusions presented within the Part 2 Assessment Lambs Business Park was subject of a third assessment to consider whether the exceptional circumstances exist to justify the site’s removal from the Metropolitan Green Belt.

4.35 The Report concludes that there are the exceptional circumstances to justify the site’s removal from the Metropolitan Green Belt. Specifically, it states that:

“This site is one of only 3 large, well-performing industrial sites in the district with good access to the strategic road that, alongside Hobbs Industrial Estate and Westerham Road Industrial Estate, forms part of the main reservoir of industrial capacity in the district. In order to ensure that well-functioning sites are safeguarded and there is sufficient suitable land to meet future demand and support the local economy going forward, the evidence considers there is a need to protect the function of this site and enhance its attractiveness and competitiveness for industrial type activities through formal designation as a strategic employment location. Further, the evidence identifies significant capacity for expansion (7.44ha), which provides opportunity to increase overall employment land supply and stem industrial decline across the district. The hatched area on the plan above indicates an area for potential expansion/intensification. The spatial strategy for the district includes the intensification and expansion of existing sites and as such this site is strategy compliant. The site is considered, in principle, suitable for development from an ecology perspective subject to mitigation measures. It also has medium/high capacity for employment development within the landscape, subject to mitigation measures. Opportunity to utilise rail siding to minimise the vehicular movements to the site.

Further, in terms of the Green Belt it has been identified that this site does not serve any of the Green Belt purposes and as such the loss of the site would not result in Green Belt harm; however, it is acknowledged that its development could impact upon the wider Green Belt but that any impact could be reduced through sensitive design and landscaping. It would also be necessary to secure robust and defensible boundaries to ensure harm to the wider Green Belt is minimised and it is considered that the current boundaries would serve this purpose, albeit they may need to be reinforced. However, whilst South Godstone has been identified as having good accessibility, including access to public transport, it is considered that it would be primarily accessed via private car by employees.

In addition the site promoter is proposing a Green Technology Park and its proposed development represents a significant opportunity for higher-value, higher-density and higher-skills based employment provision, inward as well as spin-off investment, whilst increasing access to jobs for local residents. The intensification of this site in line with the recommendations of the evidence base would make a major contribution to meeting employment needs over the plan period and achieving the Council’s economic development aspirations. It also presents significant opportunities for wider community benefit, including the environmental benefit of the proposed biomass gasification plant. In addition it would also provide the opportunity to secure biodiversity enhancement opportunities. Opportunity to use former pit areas as flood alleviation and a nature reserve.

Having considered all of the factors set out in section 3 of the paper “Green Belt Assessment Part 3: Exceptional Circumstances and Insetting” it is considered, as a matter of planning judgement, that this site does justify the exceptional circumstances necessary to recommend amendment of the Green Belt boundary.”

4.36 The conclusions presented within LRM Planning’s Exceptional Circumstances Report mirror the conclusions of the Council’s Green Belt Assessment Part 3; the exceptional circumstances exist to warrant the site’s removal from the Metropolitan Green Belt.

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2 Green Belt Assessment Part 3, Appendix 1 (2018)
5 Assessment of Purposes

5.1 The following section provides an assessment of the contribution that Lambs Business Park makes to the Metropolitan Green Belt within Tandridge District. The assessment, which is undertaken by LRM Planning, is conducted having regard to

5.2 how the site effectively meets the fundamental aim of the Metropolitan Green Belt and the five purposes to which Green Belt designations should serve, as defined by national planning policy.

5.3 As indicated in the accompanying Exceptional Circumstances Report, the need for housing and employment land within Tandridge District and the need for new waste management facilities within Surrey, cannot be met without development on Green Belt land. This is demonstrated in the following paragraphs:

Housing

5.4 In 2015, the Council carried out an assessment of its local housing need. The findings of this assessment determined that Tandridge District Council had an objectively assessed need for housing (OAN) of 9,400 dwellings between 2013 and 2033. National policy, coupled with its guidance, makes it clear that the OAN is a ‘starting point’ for determining a housing requirement. It is only through the application of evidence and the consideration of constraints that requirement can be formed, and which may be justifiably different from the OAN. Having undertaken this assessment, the Council have concluded that the emerging housing requirement should be limited to 6,056 dwellings up to 2033.

5.5 Information presented in the 2017-18 Housing and Economic Land Availability Assessment (hereafter HELAA), as updated by the Interim 2019 HELAA, indicates that 12 non-Green Belt sites were found to be deliverable and developable, with a capacity for 349 dwellings. This is significantly short of the quantum of housing land required to meet either the housing requirement in the Local Plan, or the objectively assessed needs for housing. Even when including the additional sites found as part of the Urban Capacity Study are added, there would still be a significant shortfall in meeting the Council’s housing requirement and OAN.

Employment Land

5.6 Policy TLP01 states that the Council will seek to support the delivery of at least 15.3ha of B-class employment space.

5.7 Chapter 6 of the 2017 Economic Needs Assessment Update provides an assessment of existing and potential employment land within the District. These findings have been used by the Council to inform their latest HELAA. Table 4 of the 2017-18 HELAA, as updated by the 2019 HELAA, provides a list of the existing and potential sites reviewed within the Economic Needs Assessment. Of the 36 sites assessed, only 3 sites, which together would provide 3.48ha of employment land provision, were not located within the Green Belt.

5.8 Accordingly, without developing on Green Belt sites, the employment land requirement as outlined within the emerging Local Plan could not be met.

Waste

5.9 As outlined within the emerging Waste Plan, "unless some Green Belt land is allocated there will
be no certainty that sufficient land can be developed to meet the identified need for additional waste management capacity" (para. 4.3.2.3 refers). Consequently, there is an identifiable need to identify sites suitable for accommodating waste uses within the Metropolitan Green Belt within Surrey.

**Implications**

5.10 The evidence presented above suggests that if the development needs are to be met within the District, there will be a clear necessity to amend Green Belt boundaries.

5.11 As outlined above, national planning policy recognises the need, in certain circumstances (exceptional circumstance), to review Green Belt boundaries in order to identify adequate land to accommodate development needs, which can contribute to securing the most sustainable patterns of development.

5.12 The assessment below demonstrates the limited contribution that Lambs Business Park makes to the Metropolitan Green Belt and the five purposes of designating Green Belt land. This work forms part of the wider exceptional circumstances case for removing the site from the Green Belt. The full case is provided in the accompanying Exceptional Circumstances report, as well as the Council’s evidence base.

**Main Purpose**

5.13 The main purpose of the Metropolitan Green Belt is to prevent urban sprawl by keeping land permanently open within the countryside surrounding the metropolitan area of greater London. As such the most sensitive areas of the Green Belt surrounding Lambs Business Park are to the north, towards London. Additional development to the west of Lambs Business Park and in the former quarry area would not affect the open nature of the countryside between the subject site and Greater London.

5.14 Proposals for the redevelopment of Lambs Business Park will be subject to a comprehensive technical assessment. The initial findings of the work have been summarised in the accompanying Development Framework Document. The technical work has already been used to underpin a masterplan which has been prepared to ensure its compactness within the site’s physical boundaries. Therefore, a distinction can be drawn between a compact and contained development that responds to the site’s previous and existing uses, as well it’s environmental constraints and opportunities, and the urban sprawl Green Belt policy seeks to prevent.

**Purpose 1 – To Check the Unrestricted Sprawl of Large Built-Up Areas**

5.15 Whilst Lambs Business Park itself cannot be considered to be a large built-up area, the boundaries of the site are clearly defined by both existing built development, industrial and manufacturing processes and natural features (woodland and water features). Land uses within the site also pre-date the original Green Belt designation. The subject site therefore currently makes no contribution to this purpose.

5.16 As demonstrated within the accompanying Development Framework Document, the proposals have been carefully masterplanned so that they don’t extend beyond the natural boundaries formed by the significant woodland to the west and south, the water feature in the south west portion of the site and the physical extent of the Industrial Estate to the east. The northern
boundary is clearly defined by the Tonbridge to Reading railway line.

5.17 Whilst the proposed extension of the site to the west would lead to modest encroachment into the countryside, it would not constitute the unrestricted sprawl of large-built up areas. Therefore, this purpose is of little relevance.

Purpose 2 – To Prevent Neighbouring Towns Merging Into One Another

5.18 Purpose 2 is a particular consideration to potential directions of growth for established urban areas. The nearest towns and villages to the subject site are set out below:

- **East** – The Green Belt to the east prevents coalescence between the site and South Godstone and Crowhurst Lane End. South Godstone is the closest settlement to the site, located just over 1km to the east.
- **South East** – The Green Belt to the south east prevents coalescence between the site and Blindley Heath. Blindley Heath is approximately 2.5km to the south east of the site. The boundary of the site is also clearly defined by significant tree and hedgerow planting, which links to Birchen Coppice.
- **South** – The Green Belt to the south prevents coalescence between the site and Horne. Horne is over 4km to the south of the site. The boundary of the site is also clearly defined by significant tree and hedgerow planting, which links to Birchen Coppice.
- **South West** – The Green Belt to the south west prevents coalescence between the site and Outwood. Outwood is over 4km to the south west of the site. The boundary of the site is also clearly defined by significant tree and hedgerow planting, which links to Birchen Coppice.
- **West** – The Green Belt to the west prevents coalescence between the site and South Nutfield and Redhill. South Nutfield is the closest settlement to the west and is over 4 kilometres from Lambs Business Park. The boundary of the site is also clearly defined by Maple Wood. The M23 also provides a physical barrier between the site and South Nutfield.
- **North West** – The Green Belt to the north west prevents coalescence between the site and Bletchingley and Nutfield. The boundary of the site is also clearly defined by Maple Wood and the railway line. The M23 also provides a physical barrier that would prevent the site merging with Nutfield. Bletchingley is approximately 3km to the north west.
- **North** – The Green Belt to the north prevents coalescence between the site and Godstone. The Tonbridge to Reading railway line provides a physical barrier which would prevent the site merging with Godstone. Godstone is over 3km to the north of the site.
- **North East** – The Green Belt to the east prevents coalescence between the site and Tandridge. Tandridge is over 3.5km to the north east of the site. The Tonbridge to Reading railway line also provides a physical barrier which would prevent the site merging with Godstone.

5.19 The distance between the site and all of the surrounding settlements is significant. As the footprint of the site is only proposed to be expanded to the west, theoretically, that is the only direction of growth where coalescence is a potential concern. However, as the nearest settlement to the west of the site is over 4km away, it is not considered that the expansion of the site would cause the merging of built-up areas.
Purpose 3 – To Assist in Safeguarding the Countryside from Encroachment

5.20 The existing Business Park, its associated infrastructure and the railway line to the north, provide a significant amount of built development within the Green Belt. This built development on the eastern area of the subject site predates the first Green Belt designation in Tandridge District. Whilst the boundary of the Business Park has not altered in any way since the designation was originally made, the planning status afforded to the site as a Strategic Employment Site within the Green Belt has provided the opportunity for the area to adapt, albeit in a limited and constrained manner.

5.21 It is acknowledged that development of the western area of the site (the former Quarry) could constitute encroachment into the countryside. As an undeveloped area, Green Belt policy has therefore operated successfully, but it now needs to be viewed against the development pressures faced by the District.

5.22 As indicated above, to meet the full objectively assessed needs for development land within the District, it will be necessary to develop on land that is currently located within the Metropolitan Green Belt (para. 14.3 of the draft Local Plan refers). The modest westward extension of the Business Park can be accommodated in a manner that will secure a defensible boundary in the form of:

- To the north: The Tonbridge and Reading Railway Line;
- To the east: The boundary of the existing Business Park;
- To the west: Significant woodland – Maple Wood; and
- To the south: Significant woodland – Birchen Coppice.

5.23 In addition to the above, the landscape assessment prepared by Arup concludes that given the screening provided by the existing topography and vegetation within and surrounding the site, it can comfortably accommodate new development of between 20 and 30m in height above existing site levels, which, on the whole, is greater than being proposed. These natural features provide considerable screening that means that there is only one visual receptor for which the proposed development provides a moderate significant impact, and this will only affect passengers on the Tonbridge to Reading Railway Line.

5.24 It is also noted that the western area of the site currently has a planning status for clay extraction, inert waste recovery operations and as a depot to handle and process re-saleable railway ballast. It is acknowledged that technically the site cannot be considered as being previously development land (Annex 2 of the NPPF refers). However, in the context of the demonstrable need for land within the Green Belt to be used to meet development requirements, the characteristics of the existing and previous uses associated with the western area of the site and the length of time a full restoration could take to complete (2047), will make the site a more attractive proposition to develop than other undeveloped areas of the countryside. Arup’s Landscape Assessment even demonstrates that the proposed development could improve access to recreational opportunities, as well as the site’s visual amenity. These improvements would be delivered as part of a comprehensive landscape and restoration strategy for the western area of the site.

5.25 Given the above, the site currently makes little contribution to this purpose. The extension of the site in a westward direction would lead to encroachment, but this is likely to be preferable to
developing in other areas of the undeveloped countryside in Tandridge District. The accompanying Development Framework Document and the Technical Evidence Document indicates that the proposed development can be accommodated on the site with little harm. In landscape and ecological terms, the development even provides the potential for betterment.

**Purpose 4 – To Preserve the Setting and Special Character of Historic Towns**

5.26 The Heritage Assessment of the subject site has demonstrated that there is one conservation Area within 1km of the site; the South Park Conservation Area. It is located approximately 340m to the north west. The Heritage Assessment concludes that the proposed development will have no impact on the Conservation Area, or its setting. Accordingly, the existing Business Park, nor the extension proposed by the accompanying Development Framework Document, would adversely affect the character of the setting or the character of the Conservation Area.

**Purpose 5 – To Assist in Urban Regeneration by Encouraging the Recycling of Derelict or Other Land**

5.27 Whilst the wider designation of the Green Belt within Tandridge District has undoubtedly assisted in promoting the re-use of previously developed land, it has, in the case of the subject site, prevented it from achieving its full development potential.

5.28 As seen from the preceding local planning policy section, the Development Brief for the eastern portion of the subject site was prepared to support its infilling, partial or complete redevelopment. The policy context sought to reduce the quantum of development on the subject site without an assessment of what form and type of development could be accommodated on the site without significantly harming the purposes of the Green Belt. The policy context therefore significantly underplayed the contribution the site could make to meeting the need and demand for commercial space within the District. The Green Belt designation and the related policy context has therefore had a detrimental impact on the role that the site could play in achieving the Green Belt purpose of recycling derelict land. Indeed, from 2018 the vast majority of the existing buildings proposed to be demolished, will in any event be unlettable as a result of their EPC rating (below G). In addition, from 2023, regardless of the period of time remaining on a lease, WT Lamb will not be able to lease the buildings to an existing occupier. Commercial advice provided to WT Lamb has indicated that it would not be economically viable to refurbish these units to improve their EPC rating. Consequently by 2023 at the very latest, the buildings will be vacant and redundant. Their redevelopment will therefore be essential to ensure that Lambs Business Park continues to make a full economic contribution to the functioning economic area.

5.29 Whilst the western land parcel falls outside the existing Strategic Employment Site designation and technically cannot be considered as being previously development land (Annex 2 of the NPPF refers), the historic and current uses on the site, which include its current planning status for clay extraction, inert waste recovery operations and as a depot to handle and process re-sellable railway ballast, means that it offers limited value as an area of the countryside. Given the historic use of the western portion of the site, its well screened nature, the significant time it could take to restore the site, its strong defensible boundaries and the need to amend the Green Belt within the District to accommodate the need for housing and commercial land, it offers an opportunity the existing quarry area offer an opportunity for it to be recycled. Its development would undoubtedly reduce the need to develop on genuinely undeveloped land.
6 Conclusion

6.1 Information contained within the emerging Tandridge District Local Plan and its accompanying evidence base suggests that in order to meet the identified development needs in full, amendments to the Green Belt boundary within the District will be required. Moreover, in order to meet the need for new waste management facilities within Surrey, development on Green Belt Sites will also be required.

6.2 The sites identified within the existing Green Belt to help meet these development pressures, including Lambs Business Park have been selected for a range of reasons, including the contribution each site makes to the purposes of the Metropolitan Green Belt and whether the exceptional circumstances exist to justify the site’s release from the Metropolitan Green Belt.

6.3 An Assessment of the contribution areas within Tandridge District make to the Metropolitan Green Belt has been provided by the Council (Green Belt Assessments Part 1 and 2). In addition, the Part 3 Assessment seeks to understand whether the exceptional circumstances exist to justify each site’s removal from the Green Belt.

6.4 This assessment, which has been prepared by LRM Planning, seeks to supplement that Council’s Part 1 and 2 work. In addition, the separate Exceptional Circumstances Report seeks to supplement the Council’s Part 3 Assessment.

6.5 This Report concludes that whilst Lambs Business Park and the adjacent quarry is partly allocated as a Strategic Employment Site that falls entirely within the Metropolitan Green Belt, the analysis confirms that development in this location would not compromise any of the national planning policy Green Belt purposes. In particular:

- The Lambs Business Park constitutes existing built development. Proposals to redevelop the Park, which include an extension to the west, would not undermine the primary purpose of the Metropolitan Green Belt, which is to keep land permanently open in the areas surrounding London. The proposed development would not reduce the area of open country between the subject site and the metropolitan area of London;
- The subject site cannot be considered as being a large built-up area. Nonetheless, boundaries of the subject site are well defined by built development and natural features. Within the envelope created by these constraints, development of up to 30m in height can be accommodated with little visual harm. The strong existing boundaries would ensure than any development could not be considered as being unrestricted sprawl;
- The expansion of the subject site will not cause towns to merge. The distance between the subject site and the surrounding settlements is significant and therefore a modest reduction in the gap would not lead to coalescence;
- The site is divided into two-character areas, which include built development associated with the existing Business Park and the existing quarry. Clearly given the quantum of development within the existing Business Park, the eastern portion of the site cannot be contributing to the purpose of keeping the countryside from encroachment. It is acknowledged that extending the Business Park to the west would technically constitute encroachment into the countryside, albeit very modestly. However, an amendment to the Green Belt will provide an opportunity for development to come forward on a site which has land uses currently associated within it and which may not be restored until 2047, has a strong defensible boundary and can visually accommodate development. The development proposals could even improve access to recreational areas within the countryside, as well as the site’s visual amenity;
- The proposed development would not impact on the setting or the special character of any historic towns; and
- The Green Belt designation on the site has prevented it from achieving or being used to its full potential. Whilst development in the western portion of the site would not constitute development on previously developed land, for the reasons set out above, it must be considered as being preferable than a site that has had no previous use associated with it.

6.6 In light of these conclusions, the proposed development is preferable to new development taking place at another site, in a more sensitive area of the Green Belt. As a result of the technical work prepared to date, a distinction can be drawn between the proposed development, which can be developed with little environmental harm and the urban sprawl Green Belt policy is designed to prevent.

LRM Planning
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Appendix 1 – Site Location Plan