



**PROPOSED RESIDENTIAL DEVELOPMENT AT
OXTED GASHOLDER AND JOHNSDALE CAR PARK, OXTED**

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Contents

1.0	Introduction	1
	Planning Application Documents	1
	Structure of Statement	2
	EIA Screening Opinion	2
2.0	Background	3
	St William Homes LLP	3
	Pre-application	3
	Site and Surroundings	4
	Land Use Designations	4
	Planning History	4
3.0	Proposed Development	6
	Land Use	6
	Layout and Height, Scale and Massing	6
	Quantum and Dwelling Mix	6
	Landscaping, Amenity Space and Residential Environment	7
	Materials and Detailed Design	7
	Access, Servicing and Parking	7
4.0	Planning Policy Considerations	8
	National Planning Policy Framework (2012)	8
	The Statutory Development Plan	9
5.0	Assessment of Proposed Development	12
	Principle of Development	12
	Proposed Dwelling Mix and Tenure	13
	Scale, Layout and Design	13
	Residential Amenity	14
	Access and Parking	14
	Density	15
	Sustainability and Energy	16
	Flood Risk and Drainage	16
	Noise and Air Quality	16

	Daylight, Sunlight and Overshadowing	16
	Contamination	17
	Arboriculture	17
	Archaeology	17
	Ecology and Biodiversity	18
6.0	Community Infrastructure Levy	19
7.0	Conclusion	20

1.0 Introduction

1.1 This Planning Statement has been prepared by Lichfields on behalf of St William Homes LLP to accompany a full planning application for the redevelopment of the former Oxted Gasholder site and Johnsdale car park.

1.2 This application seeks full planning permission for:

‘Demolition of existing gasholder, erection of 111 residential apartments (C3 Use), together with the provision of an enhanced access route, landscaping and associated car parking’.

1.3 The purpose of this Planning Statement is to assess the proposed development against relevant planning policies in the development plan and having regard to other relevant material planning considerations.

1.4 St William previously submitted a planning application for 77 new homes on the former Oxted gasholder site, which was granted permission on 16 January 2018 (LPA Ref: TA/2017/2064). St William is now submitting an application for the development of 111 residential apartments on a larger site, which now incorporates the adjacent Johnsdale car park site. This proposed scheme builds upon the principles of the consented application.

1.5 The proposed development presents the opportunity to provide a high-quality residential development that will help to redevelop a highly sustainable brownfield site at the centre of Oxted, which is allocated by the Council in the draft Local Plan for residential redevelopment. The development will contribute to the housing need within the District and will deliver a range of 1, 2 and 3 bedroom apartments meeting the needs of the local area. The redevelopment of this site includes the demolition of the 30m high decommissioned gasholder and associated structures which have blighted Oxted town centre for many years.

Planning Application Documents

1.6 The scope of the documents required to support this application was agreed with Tandridge District Council Planning officers during pre-application discussions.

1.7 Along with this Planning Statement, the planning application is accompanied by the following supporting documents:

- 1 Application Drawings, prepared by St William;
- 2 Design and Access Statement, prepared by St William;
- 3 Landscape Design and Access Statement, prepared by Murdoch Wickham;
- 4 Transport Assessment and Travel Plan, prepared by Vectos;
- 5 Flood Risk and Drainage Assessment, prepared by WSP;
- 6 Daylight and Sunlight Report, prepared by Delva Patman Redler;
- 7 Noise Assessment, prepared by Cole Jarman;
- 8 Archaeological Assessment, prepared by CgMS;
- 9 Land Contamination and Remediation Assessment, prepared by Hydrock;
- 10 Sustainability and Energy Assessment, prepared by the FES Group;
- 11 Statement of Community Engagement, prepared by Lexington Communications;
- 12 Arboricultural Survey and Impact Assessment, prepared by Keen Consultants; and
- 13 Ecology and Biodiversity Assessment, prepared by Aspect Ecology.

Structure of Statement

- 1.8 This Planning Statement comprises the following sections:
- Section 2 describes the site, its context and pre-application discussions;
 - Section 3 provides a summary of the proposed development;
 - Section 4 sets out the relevant planning policy context;
 - Section 5 assesses the development having regard to planning policy; and
 - Section 6 refers to the Community Infrastructure Requirement
 - Section 7 sets out the conclusions.

EIA Screening Opinion

- 1.9 An Environmental Impact Screening Request was submitted prior to the submission of the application for 77 apartment scheme (LPA Ref: 2017/2054/EIA). The Screening Opinion concluded that EIA was not required for the development at that time.
- 1.10 As this planning application is for a revised, larger scheme on a larger site, a new Screening request was submitted on 27 March 2018. Within the screening request, it is concluded that the proposed development is not EIA development. In reaching this conclusion, regard has been had to the 2017 Regulations, and to the summary of potentially affected receptors including Ground Conditions and Contamination, Transport, Ecology, Flood Risk, Noise and Townscape and Visual Impact. A Screening Opinion is to be provided by Tandridge District Council.

2.0 Background

- 2.1 This proposed development provides an opportunity to redevelop and regenerate the decommissioned former Oxted Gasholder and Johnsdale Carpark site on a large brownfield site that has been partially vacant for many years. The application site is located within Oxted town centre and is in a highly accessible and sustainable location, ideally suited for residential development.
- 2.2 The application site is identified within the draft Local Plan 'Sites Consultation' (Regulation 18, November 2016) as 'Site OXT 16 - Oxted Gasholder, Station Road East, Oxted' which covers a wider site area and is allocated for residential development. The site allocation covers 0.91ha (of which the application site is 0.59ha). The draft site allocation states that the site is "in principle, considered to be in a sustainable location with little or no constraint to development, subject to potential land contamination being addressed".
- 2.3 In addition, St William previously submitted a planning application for 77 new homes on the former Oxted gasholder site, which was granted permission on 16 January 2018 (LPA Ref: TA/2017/2064). St William is now submitting an application for the development of 111 residential apartments on a larger site which now incorporates the adjacent Johnsdale car park site. This proposed scheme builds upon the principles of the consented application.
- 2.4 St William is proposing a residential development with high-quality landscaping that will deliver a strong sense of place and make a positive contribution to the quality of the built environment, creating a socially sustainable development, in accordance with local and national planning policy.

St William Homes LLP

- 2.5 St William is a joint venture between the Berkeley Group and National Grid and specialise in redeveloping redundant gasholder sites across London and the south-east. St William has unlocked some of the most technically complex regeneration sites at the heart of communities and place great importance on the quality of the landscape in order to create successful place where people want to live.
- 2.6 The Berkeley Group is an established developer with experience in exemplary place making who specifically seek to create developments that are socially sustainable.

Pre-application

- 2.7 Two pre-application meetings were held with Tandridge Officers on 6 February and 7 March 2018 to discuss the proposed scheme. This is in addition to the four pre-application meetings that were held on the previous Oxted planning application (LPA Ref: TA/2017/2064).
- 2.8 At the pre-application meeting on 6 February 2018, Officers stated that the proposed development is an improvement from the approved scheme, as the proposed design that comprises the curved tapering of the buildings, opens up the development and reduces bulk.
- 2.9 At the second pre-application meeting on 7 March 2018, St William presented their final proposals, provided feedback from the first consultation event and discussed submission of the planning application.
- 2.10 In respect of public communication, St William presented to Members of Tandridge District Council on 22 February 2018, and addressed Member's questions on the scheme. St William also held a two-day public exhibition to present the proposed scheme to local residents, which was held on 3 and 8 March 2018 at Oxted Community Hall and Oxted Library respectively.

- 2.11 Invitations to the exhibitions were distributed to over 1,000 local residents and businesses, and the events were advertised in a local newspaper, the Oxted County Border News. In addition to the public exhibition, a consultation website went live on 3 March 2018, which included information on the proposed development and an opportunity to provide feedback.
- 2.12 A total of 165 members of the public attended the public exhibition over the two days, and feedback forms were received from 53 individuals. A full account of the public consultation undertaken and the responses received is included in the SCE, prepared by Lexington Communications.

Site and Surroundings

- 2.13 The application site comprises the 30m high decommissioned gasholder and the Johnsdale car park. The gasholder site was decommissioned in 1964, and the remaining structure is equivalent in height to a ten-storey residential building. The car park is restricted to use by permit holders only. The levels on the site drop considerably from the east to the west (by approximately 13m).
- 2.14 The development site is located between the Oxted railway line which serves nearby Oxted rail station, and the properties that front onto Station Road East, with the backs of commercial properties to the northern and western boundaries of the site. The site is accessed via two existing access roads from Station Road East and Johnsdale. The site is bound by a dense tree buffer which runs along the south of the development site, with a steep embankment up to the railway line and a supermarket carpark beyond.
- 2.15 To the south of the site are residential properties on Johnsdale, comprising two-storey semi-detached dwellings. The buildings along Station Road East, bordering the north and east of the development site, comprise of mostly two and three-storey properties with retail and restaurants at the ground floor with residential or ancillary commercial accommodation to the upper floors. The buildings along Station Road East, bordering the north of the development site, comprise mostly two and three-storey properties with retail and restaurants at the ground floor with residential or ancillary commercial accommodation to the upper floors.
- 2.16 The site is located in a highly sustainable location and is c.160m from Oxted railway station, which offers services to London and East Grinstead. The site is 0.59ha, as identified on the Site Location Plan.
- 2.17 The wider area is characterised by a mixture of residential buildings, typically of two to three storeys.

Land Use Designations

- 2.18 As detailed on the Core Strategy Policies Map, the site is within the designated Town Centre, located behind the Primary Shopping Area. The site is not within a Conservation Area. The Oxted Conservation Area is to the south-west of the site, beyond the railway line. There are no Listed Buildings on the site or nearby. The site is not located in close proximity to an SPA, the closest being Ashdown Forest located approximately 18.6km to the south of the site.
- 2.19 The site is within Flood Zone 1 (low risk) and within Groundwater Source Protection Zone 3.
- 2.20 Further details of the locality are described in the Design and Access Statement submitted with the application.

Planning History

- 2.21 As detailed above, the former Oxted Gasholder site was granted full planning permission on 16 January 2018 for 77 dwellings, with associated parking and landscaping (LPA Ref:

TA/2017/2064). This permission covers the majority of the application site, but does not include the Johnsdale car park part of the application site.

3.0 Proposed Development

- 3.1 This planning application proposes to redevelop the former Oxted gasholder site and Johnsdale car park within Oxted town centre, creating a new high-quality residential development with landscaped podium gardens in the centre of the development accessible from each building and enhanced access road. The proposed development includes the demolition of the existing 30m gasholder and removal and remediation of contaminated land across the site. The brownfield site will be redeveloped to create a sustainable development that provides much needed housing within Tandridge District.
- 3.2 St William and their team of technical consultants have been working on preparing a proposal for a residential development that makes the most efficient use of brownfield land in a central location within Oxted. The scheme has been consulted on with statutory consultees and local residents.
- 3.3 This Section provides a summary of the description of the proposed development. A fully detailed description of the proposal is set out in the accompanying Design and Access Statement (DAS).

Land Use

- 3.4 The proposed development is for a new residential development on the site and comprises the *“Demolition of existing gasholder, erection of 111 residential apartments (C3 Use), together with the provision of an enhanced access route, landscaping and associated car parking”*.
- 3.5 The proposed development includes 147 car parking spaces, including four visitor car parking spaces and seven disabled car parking spaces.
- 3.6 The scheme will also provide private amenity space in the form of balconies, terraces and a communal landscaped amenity area at podium level accessible to residents.

Layout and Height, Scale and Massing

- 3.7 The proposed development consists of three buildings, two of which connect at ground to third floor and divide into two blocks at upper floors. The scheme includes an arrival space from the Station Road East access point which connects to a central communal landscaped podium garden.
- 3.8 The heights of the proposed buildings are up to five storeys above the ground floor podium.
- 3.9 Details of the scheme are provided in the submitted Design and Access Statement (DAS).

Quantum and Dwelling Mix

- 3.10 It is proposed that the scheme will incorporate a range of homes, from one-bed to three-bedroom apartments. For viability reasons, it is not proposed to provide any affordable apartments. In total, the scheme comprises 111 apartments in the following mix:
- 20 one bedroom apartments (18%);
 - 70 two-bedroom three person apartments (63%); and
 - 21 three-bedroom six person apartments (19%).

- 3.11 The scheme has been designed to accommodate Building Regulations and the general principles and requirements of the Lifetimes Home Standards and this is explained in the accompanying DAS.

Landscaping, Amenity Space and Residential Environment

- 3.12 The development will provide for private amenity space in the form of private balconies or terraces to all apartments. In addition, there will be a landscaped podium garden in the centre of the development which is for communal use for all residents.
- 3.13 More details of the proposed landscape, amenity space and residential environment are set out in the submitted Design and Access Statement and Landscape Statement.

Materials and Detailed Design

- 3.14 It is proposed that the development will be constructed of a simple palette of high-quality materials. Further information on the detailed design and materials is included in the accompanying DAS.

Access, Servicing and Parking

- 3.15 Vehicular and pedestrian access to buildings A and B and the landscape gardens will be via the existing access road from Station Road East which will be improved with hard and soft landscaping treatment. Vehicular access only to Building C will be via the Johnsdale service road to the rear of commercial properties on Station Road East.
- 3.16 The development will provide 147 car parking spaces. This includes four visitor car parking spaces and seven disabled car parking spaces. There will be 15 electric vehicle charging points provided. The development will also provide 134 cycle parking spaces. These will be accommodated within the secured car parks for each block and within a separate storage area on the lower ground floor.
- 3.17 Servicing to the apartments will take place via the access off Station Road East. No servicing or deliveries will take place from Johnsdale. A loading bay will be provided within the vehicle circulation area outside building A

4.0 **Planning Policy Considerations**

4.1 This Section identifies the planning policy and guidance at a national and local level relevant to this proposal. It then identifies key planning considerations against which the planning application will be determined. The proposed development is assessed against these key planning considerations in Section 5.

4.2 Section 38(6) of the Planning and Compulsory Purchase Act 2004, states that:

“If regard is to be had to the development plan for the purpose of any determination to be made under the planning acts the determination must be made in accordance with the plan unless material considerations indicate otherwise”.

4.3 The Statutory Development Plan for the application site is currently made up of the Core Strategy (2008) and Local Plan Part 2 Detailed Policies (2014).

4.4 Other Material Considerations are the National Planning Policy Framework (NPPF, 2012); National Planning Policy Guidance (NPPG), the various Supplementary Planning Guidance Documents prepared by Tandridge District Council and emerging policy documents as set out below.

4.5 The Council aims to publish their Proposed Submission draft for consultation in summer 2018, with the aim to submit to the Secretary of State in winter 2018. Adoption is anticipated in winter 2019.

4.6 The Tandridge Local Plan (2033) will seek to deliver much needed infrastructure, support local businesses and attract inward investment, and provide urgently needed homes for communities.

National Planning Policy Framework (2012)

4.7 National Planning Policy Framework (NPPF) was published in March 2012 and sets out the Government’s planning policies for England. It is a material planning consideration in decision-making.

4.8 The NPPF states that the purpose of the planning system is ‘to contribute to the achievement of sustainable development’ (paragraph 6).

4.9 Paragraph 7 sets out the three dimensions of sustainable development: ‘economic’ in contributing to a strong and competitive economy; ‘social’ in supporting strong communities and providing the supply of housing required for present and future generations; and ‘environmental’ in protecting and enhancing the environment.

4.10 The NPPF states that in respect of decision-making that Authorities should support applications for sustainable development and to approve development proposals that accord with the development plan without delay. Paragraph 14 states that at the heart of the National Planning Policy Framework is a presumption in favour of sustainable development, which should be seen as a golden-thread running through both plan-making and decision-taking.

4.11 The Core Planning Principles in the NPPF (paragraph 17) states that every effort should be made to objectively identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth. They emphasise the need to make effective use of previously developed land. Further, the Housing White Paper ‘Fixing our broken housing market’ (2017) emphasises the importance of delivering the new homes that we need and on bringing brownfield land back into use: *“We must make as much use as possible of previously-developed (‘brownfield’) land for homes”*. Further, the White Paper considers that

“the presumption should be that brownfield land is suitable for housing, unless there are clear and specific reasons to the contrary”.

- 4.12 Paragraphs 47-55 of the NPPF set out the policies seeking to boost housing supply and to ensure delivery of a wide choice of high quality homes. Paragraph 47 states that LPAs should use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing, identify and update annually a supply of specific deliverable sites sufficient to provide for housing against their housing requirements.
- 4.13 Paragraph 49 confirms that housing applications should be considered in the context of the presumption in favour of sustainable development.
- 4.14 Good design is a key aspect of sustainable development and should contribute positively to making places better for people (Paragraph 56) and promote or reinforce local distinctiveness (Paragraph 50).
- 4.15 Paragraph 32 states that all developments that generate significant amount of movement should be supported by a Transport Statement.
- 4.16 In relation to car parking, paragraph 39 of the NPPF states that:
- “In setting local parking standards for residential and non-residential development, local planning authorities should take into account:*
- The accessibility of the development;*
 - The type, mix and use of development;*
 - The availability of and opportunities for public transport;*
 - Local car ownership levels; and*
 - An overall need to reduce the use of high-emission vehicles.”*

The Statutory Development Plan

- 4.17 The current Development Plan includes the Core Strategy (2008) and Detailed Policies (2014).

Core Strategy (2008)

Relevant policies include:

- Policy CSP 1 Location of Development
- Policy CSP 2 Housing Provision
- Policy CSP 3 Managing the Delivery of Housing
- Policy CSP 4 Affordable Housing
- Policy CSP 7 Housing Balance
- Policy CSP 11 Infrastructure and Services
- Policy CSP 12 Managing Travel Demand
- Policy CSP 14 Sustainable Construction
- Policy CSP 15 Environmental Quality
- Policy CSP 17 Biodiversity
- Policy CSP 18 Character and Design
- Policy CSP 19 Density

- Policy CSP 21 Landscape and Countryside
- Policy CSP 22 The Economy
- Policy CSP 23 Town and other centres

Local Plan Part 2 Detailed Policies (2014)

- 4.18 The main relevant policies to the current application proposal are summarised below and the scheme is considered against these in the following section.
- 4.19 DP1 Sustainable Development – confirms that when considering development proposals, the Council will take a positive approach that reflects the presumption in favour of sustainable development.
- 4.20 DP2 Town Centre Development – confirms that within the Town Centre of Oxted, the Council will support proposals for new development where they are appropriate in terms of scale, type and design. Proposals must not adversely affect the viability and vitality of the Shopping Area or the environmental and amenities of the surrounding areas including residential properties.
- 4.21 DP5 Highway Safety and Design – Development should provide safe and suitable access to the site which is achievable by all and promotes access by public transport, foot and bicycle to nearby facilities.
- 4.22 DP7 General Policy for New Development – states that all new development should be of a high quality design and should integrate effectively with its surroundings. Part B of the policy states that where the principle of the proposed development is in accordance with other policies in the Development Plan, permission will be granted where the following matters are effectively addressed:
- Character and layout respects and contributes to local distinctive character, appearance and amenity of the area;
 - Built form – in keeping with the prevailing landscape/streetscape and using complementary building materials.
 - Parking: The proposal has regard to the adopted Parking Standards SPD (2012) or successor documents; maintains existing off-street parking spaces (including garages) where they are considered necessary to serve the existing buildings or use; and does not result in additional on-street parking where this would cause congestion or harm to amenity or highway safety.
 - Design Guidance: The proposal conforms with the guidelines as set out in adopted Conservation Area Appraisals, Village Design Statements, and Design Guidance in the form of Supplementary Planning Guidance (SPGs) and Supplementary Planning Documents (SPDs);
 - Safety: The proposal has regard to the Police ‘Secured by Design’ standards to create safe and secure environments that reduce the risk of crime. Where appropriate, a scheme should also incorporate advice contained in the government’s guidance on terrorism in the Planning Practice Guidance.
 - Safeguarding Amenity
 - Amenity: The proposal does not significantly harm the amenity of neighbouring properties by reason of pollution (noise, air or light), traffic, or other general disturbance;
 - Privacy: The proposal does not significantly harm the amenities and privacy of occupiers of neighbouring properties (including their private amenity space) by reason of overlooking or its overshadowing or overbearing effect. In most circumstances, where habitable rooms of properties would be in direct alignment, a minimum privacy distance of 22 metres will be

required. This distance may need to be increased to protect those parts of gardens which immediately adjoin dwellings or where sites are sloping. In most circumstances, a minimum distance of 14 metres will be required between principal windows of existing dwellings and the walls of new buildings without windows;

- Environment: The proposals provide a satisfactory environment for the occupiers of both the existing and new development; the proposal should not significantly harm the amenities and privacy of occupiers or neighbouring properties (including their private amenity space) by reason of overlooking or its overshadowing or overbearing effect.
- 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.

4.23 DP19 biodiversity, Geological Conservation and Green Infrastructure – seeks to conserve and enhance the natural environment.

4.24 DP21 Sustainable Water Management – states water should be retained in the natural environment as far as possible. Flood Risk - 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.

4.25 DP22 Minimising Contamination, Hazards and Pollution - In respect of Land Contamination it states that “Proposals for development on land that is or may be contaminated will be permitted provided that there will be no unacceptable risk to health or the environment and provided adequate remedial measures are proposed which would mitigate the effect of any contamination and render the site suitable for use. Where there is evidence of a high risk from residual contamination the applicant will be required to show as part of the application how decontamination will be undertaken”.

4.26 Noise: For proposals involving new residential development sited close to transport derived noise sources, applications will be considered against the noise exposure categories as outlined in the Noise Exposure Categories table (see supporting text), as well as other material considerations where necessary.

Emerging Local Plan

4.27 Tandridge District Council is currently preparing their Local Plan. Consultation on the draft Local Plan Sites Consultation (Regulation 18) closed in December 2016. In March 2018 a revised Local Development Scheme (LDS) was approved by Council. This LDS states that consultation on the Local Plan Proposed Submission draft is expected between July and September 2018.

Parking Standards SPD (2012)

4.28 Parking standards are set out within the TDC Parking Standards SPD (2012). The appendix for residential parking standards required 1.5 spaces (unallocated) and 2 spaces (allocated) for 1 and 2 bedroom flats and 2 spaces (unallocated) and 2.25 spaces (allocated) for 3 bedroom flats. The TDC car parking standards do not stipulate a minimum number of car parking spaces which should be allocated for visitors.

5.0 **Assessment of Proposed Development**

5.1 This Section provides a comprehensive assessment of the proposed development having regard to the Development Plan Policies outlined above.

5.2 From analysis of the statutory development plan, national policy it is considered that the following planning considerations represent the key policy issues against which the planning application should be considered:

- 1 The principle of development;
- 2 The acceptability of the proposed dwelling and tenure mix;
- 3 The development's scale, layout and design;
- 4 The standard of the proposed residential accommodation and residential amenity standards;
- 5 The impact of the proposal in terms of transport, access and parking;
- 6 The acceptability of the proposed residential density;
- 7 The environmental sustainability of the scheme;
- 8 Flood risk and drainage;
- 9 The acceptability of the proposal in terms of noise and air quality;
- 10 Daylight and sunlight;
- 11 Contamination and remediation;
- 12 Arboriculture;
- 13 Ecology and biodiversity; and
- 14 Archaeology

5.3 The development plan must be looked at as a whole taking into account an assessment of material considerations and legislative considerations. This assessment is provided in the following section.

Principle of Development

5.4 It is recognised within the NPPF that new homes are needed, and that effective use should be made of previously developed land in sustainable locations. Paragraphs 47-55 of the NPPF set out the policies seeking to boost housing supply and ensure delivery of a wide choice of high quality homes.

5.5 The site is a brownfield, sustainable site located within Oxted Town Centre. The site is identified within the draft Site Allocations Regulation 18 document (November 2016) as being suitable for residential development. Full planning permission has been granted for the development of 77 apartments on the gasholder part of the site (LPA Ref: TA/2017/2064).

5.6 The proposed development would deliver 111 new homes, mixed and balanced by size, which would make a contribution to the housing need within Tandridge.

5.7 The Council's Strategic Housing Market Assessment (SHMA) (2015) indicates an Objectively Assessed Need (OAN) of 470 dwellings per annum. Based on a housing supply of 1,000 dwellings, as set out in the Annual Monitoring Report 2016-17, this would indicate that the Council does not have a five year housing land supply and, as such, there is a presumption in favour of granting planning permission for sustainable development. The proposed

development does not give rise to any adverse impacts that would significantly outweigh the benefits and there are no policies in the NPPF that indicate that development should be restricted.

- 5.8 Residential development of this highly sustainable brownfield site therefore accords with the Development Plan and the NPPF and the principle of residential development is accepted.

Proposed Dwelling Mix and Tenure

- 5.9 Core Strategy Policy CSP7 states that the Council will require all housing developments to contain an appropriate mix of dwelling sizes in accordance with current identified needs for particular areas of the District.

- 5.10 During pre-application discussions for the approved scheme for 77 apartments, Officers noted that the policy CSP7 is based on an out-dated housing needs survey. Nevertheless, the results of the 2005 SHMA showed an oversupply of one and three bedroom apartments. Notwithstanding this, the proposed scheme provides a mix of apartment sizes and would not result in the concentration of any one size of apartments.

- 5.11 St William has undertaken their own detailed market research into demand in the local area and the type of apartments currently on the market in Oxted and surrounding towns and villages and this has helped to inform the proposed apartment mix. The below confirms that the scheme proposes a range of apartment sizes so as to help create a balanced community.

- 20 one bedroom apartments (18%);
- 70 two-bedroom three person apartments (63%); and
- 21 three-bedroom six person apartments (19%).

- 5.12 The proposed mix is in accordance with Policy CSP7 in that it provides an appropriate mix of dwelling sizes in accordance with the needs of the local area. This mix was agreed for the previous planning application which was granted permission.

- 5.13 In terms of affordable housing provision, planning policy indicates that this should be provided, subject to viability. The Core Strategy notes that the actual provision will be negotiated on a site by site basis, after taking into account market and site conditions.

- 5.14 In this regard, paragraph 173 of the NPPF confirms that pursuing sustainable development requires careful attention to viability and costs in decision-taking. To ensure viability, the costs of any requirements likely to be applied to development, such as requirements for affordable housing, infrastructure contributions or other requirements should, when taking account of the normal cost of development and mitigation, provide competitive returns to a willing land owner and willing developer to enable the development to be deliverable.

- 5.15 On this basis, a confidential Financial Viability Assessment has been submitted to the Council. This concludes that, having regard to significant costs associated with the demolition of the gasholder and remediation of contaminated land on the site and CIL requirement for the larger site, the provision of affordable housing within the proposed development would not be viable.

Scale, Layout and Design

- 5.16 The design of the development responds to the significant change in levels on the site of approximately by 13m. The site is well contained by mature trees on the railway embankment to the west, with further screening trees on the northern and southern boundaries. The site is surrounded by built form on the north-west and south-east boundaries. In this regard, the proposal is compliant with Local Plan Detailed Policy DP7, resulting in a design which integrates

effectively within its surroundings. The proposed new development will be circa 8.8m lower than the existing gasholder and, therefore, any potential visual impact of the proposed development will be minimised from short and longer views and will, in any event, be viewed in the urban context of this centrally located site.

- 5.17 It is considered that the design responds appropriately to the site characteristics, with a high quality design in accordance with Policy CSP 18 that will result in a positive addition to the townscape with minimal visual impact. Site access improvements to the Station Road East access will incorporate a free standing ivy trellis along one side of the entrance which will soften the visual impact of the development in respect of views from the high street. A planted buffer comprising tall evergreen shrubs and a mix of trees is proposed along the southern boundary to screen views of development from properties on Johnsdale. Closed boarded timber fencing is proposed along the boundaries of the site.
- 5.18 Landscape and visual aspects have been carefully considered during the design process to ensure that environmental and landscape benefits can be maximised. It is recognised that the removal of the gasholder offers the opportunity to provide a well-designed public realm and landscape to create a high quality residential environment.
- 5.19 The Station Road East access is designed to efficiently separate vehicular paths and the landscape which creates an arrival space at the water feature and pedestrianised landscaped podium gardens. The gardens will provide pedestrian access to blocks A and B, and have been designed to allow space for planting, gassed areas and spaces for people to sit and enjoy the space.

Residential Amenity

- 5.20 The development proposals ensure all apartments have good outlook, and aspect to all apartments is in accordance with Policy DP7.
- 5.21 The scheme has been designed to ensure that adequate privacy distances are maintained between the proposed development and neighbouring buildings and particular attention has been given to the location and aspect of habitable rooms to prevent the perception of overlooking to the residential properties to the south. The distance between nearest windows in Block B and 36-37 Johnsdale on the southern boundary of the site is approximately 24m, of which is in accordance with Policy DP7 that generally seeks 22m between habitable windows.
- 5.22 It is proposed that all homes and shared areas, internal and external, would be fully accessible and have been designed in consideration of the former Lifetime Homes Standards principles.
- 5.23 The proposed accommodation has been designed to provide generously sized apartments, to ensure a high-quality internal residential environment.
- 5.24 To ensure a high-quality development, all apartments are provided with a private balcony or terrace that provides private amenity space. This is in addition to the extensive communal open space provided within the landscaped podium gardens.

Access and Parking

- 5.25 The site is situated in a central location in Oxted and is within 160m walking distance of Oxted rail station and within 170m of local bus stops.
- 5.26 Pedestrian access to the site will be provided from Station Road East through a shared surface for pedestrians and vehicles. The access will be 6.36m wide, with a 1.2m wide demarcated area which denotes the recommended route for pedestrians.

- 5.27 The site has strong public transport services. Oxted Rail Station is located approximately 160m north-west of the site, and can be accessed via Station Road East. Southern Rail provides regular services to East Croydon, East Grinstead and Central London terminal.
- 5.28 The Transport Assessment prepared by Vectos assesses the effects of the proposed development in terms of highways, parking and accessibility. Junction modelling undertaken as part of this assessment indicates that the volume of traffic generated following the occupation of the development will not result in the junction between the site access and Station Road East from exceeding capacity.
- 5.29 It is noted that the proposed 147 car parking spaces equates to a car parking to unit ratio of 1.32 to 1, which is below the TDC Residential Car Parking Standards (2012). However, these standards apply to the District as a whole, inclusive of rural sites which would necessitate far higher car usage. This site is highly accessible to public transport, the town centre and schools. On this basis, it is considered that the proposed level of parking is appropriate for this particular development, at this centrally located site. Further, the scheme proposes 134 cycle spaces exceeding policy requirements to seek to encourage sustainable modes of transport.
- 5.30 A Travel Plan has been prepared and submitted with the application which details ways to encourage active modes of transport such as walking and cycling where feasible.

Density

- 5.31 The NPPF seeks to make efficient use of previously developed land provided it is not of high environmental value and to boost the supply of housing. The Housing White Paper (February 2017) considers that *“individual developments should ensure that the density and form of development reflect the character, accessibility and infrastructure capacity of an area”*.
- 5.32 Further, the White Paper places emphasis on the requirement to use land more efficiently for development considering that individual development proposals *should “make efficient use of land and avoid building homes at low densities where there is a shortage of land for meeting identified housing requirements”*.
- 5.33 Policy CSP19 states that within Oxted Town Centre density should be within 40 to 75 dwellings per hectare. However, it also adds that this is unless the design solution for a higher density scheme is compatible with local character and distinctiveness.
- 5.34 The scheme proposes 111 apartments across 0.59ha which results in a density of 188dph, which exceeds the density guideline set out at Policy CSP19. However, this site is in an accessible location within Oxted town centre and comprises a gasholder that is the equivalent to ten residential storeys in height and sets a current precedent on height and bulk.
- 5.35 The proposed residential development is approximately 21.2m in height, which is significantly lower than the existing 30m high gasholder. The proposed development responds to the significant change in levels of 13m across the site and sits comfortably within the town centre setting. It is considered to be a significant enhancement on the existing use and is compatible with the local character and distinctiveness.
- 5.36 The proposed development provides an appropriate level of parking for this accessible, central location with good quality amenity space and it causes no harm to neighbouring properties by way of impact on privacy. As such, it is considered that the proposed density is entirely appropriate in this location and will make efficient use of the site in line with national policy guidance.

Sustainability and Energy

- 5.37 Local Policy CSP14 requires that all new development will be required to reach a 20% saving in CO₂ emissions through the incorporation of on-site renewables for a development that exceeds 10 units.
- 5.38 An Energy Statement, prepared by FES Group, has been submitted with the application which confirms that the proposal is sustainable in energy terms and will implement fabric first efficiencies and PV panels to respond to the local planning policy requirement.
- 5.39 The proposals have increased in the number of apartment since the approved application (TA:2017/1964) and the size of the roofs have become smaller. This has caused an inability to meet the 20% reduction in carbon emission via renewables only.
- 5.40 The proposed fabric and building services specification will permanently reduce energy consumption by 1.34% and reduce emission by 1.51%. The proposed PV array to the roof of the building will permanently reduce energy consumption by 7.78% and reduce emissions by 13.38%. The total reduction of CO₂ emissions through improved fabric and service efficiencies and the provision of renewable energy is 13.38%.

Flood Risk and Drainage

- 5.41 The Flood Risk Assessment submitted with the application concludes that flood risk within the site is minimal and can be managed by the existing drainage ditches and proposed development drainage. In accordance with Local Plan Detailed Policy 21, a SuDS maintenance schedule has been advanced to demonstrate adoption and maintenance proposals, including a surface water drainage strategy that follows relevant guidance and incorporates features to mitigate the impact of surface water run-off. The development therefore accords with relevant standards for flood risk and sustainable drainage and will result in minimal impact.

Noise and Air Quality

- 5.42 Local Plan Detailed Policy 22 states that applications will be considered against the noise exposure categories as outlined in the Noise Exposure Categories table, as well as other material considerations where necessary.
- 5.43 A Noise Assessment, undertaken by Cole Jarman, has been submitted with the application which, in reference to these noise exposure categories, confirms that external noise levels to ground floor communal areas are within the levels set out within BS8233:2014 guidance.
- 5.44 Enhanced specification double glazing will be provided for habitable rooms overlooking the adjacent train line in conjunction with acoustically rated trickle vents. Noise levels to external amenity spaces are considered acceptable and no mitigation is required. The assessment concludes that, overall, it is possible to provide a suitable internal noise environment to protect the amenity of future residents.

Daylight, Sunlight and Overshadowing

- 5.45 A Daylight, Sunlight and Overshadowing assessment, prepared by Delva Patman Redler, has been submitted to accompany the application to consider the effects of the proposed development on sunlight and daylight levels. The methods of assessment used were the Vertical Sky Component (VSC), No Sky Line (NSL) and Average Daylight Factor (ADF) for daylight and Annual probable sunlight hours (APSH) for sunlight.
- 5.46 The analysis concludes that the neighbouring daylight analysis illustrates that despite some minor and very isolated transgressions of the BRE Guidance that overall the general quality,

quantity and distribution of light within neighbouring habitable rooms will remain well in excess of the BRE assessment criteria in daylight terms.

5.47 The sunlight analysis shows that the amount of sunlight received by the neighbouring properties will remain fully BRE compliant.

Contamination

5.48 As detailed within the formal Oxted application, the site comprises former gasholder and there is potentially contaminated land beneath both the former gasholder and Johnsdale carpark site. As part of the application, it is proposed to demolish the existing structure and remediate the site to ensure that the site is suitable for residential occupation.

5.49 A Ground Conditions Report, for both the gasholder and carpark site, have been prepared by Hydrock and are submitted with the application.

5.50 An initial site investigation was undertaken to assess the ground conditions on the parts of the site which can be accessed. Visual contamination found on the site included evidence of tar-related contamination of the area of the site where site investigations were undertaken evidence of significantly high contaminant concentrations in soil were found in areas and evidence of spent oxide and foul lime was noted in small pockets of the site. Other pockets of contamination were also evidenced. There are also concentrations of contaminants (PAH) on the Johnsdale carpark site. Other pockets of contamination were also evidenced across the site.

5.51 There has been no site investigation under the existing gasholder, and although this is where the most contaminants are expected, the site investigation results received so far indicate that they are mostly contained and can be dealt with through various mitigation and remediation measures.

Arboriculture

5.52 There are no protected trees located on site. A Tree Survey and impact assessment, conducted by Keen Consultants, is submitted with the application. It confirms that the surrounding retained trees and Root Protection Areas will be adequately protected during the construction phase of the works, noting the requirement for some minor facilitative pruning required to a small number of retained trees.

5.53 The assessment confirms that the proposals will mitigate the loss of the lesser quality trees on site through the planting of new trees are satisfactory and appropriate.

Archaeology

5.54 The Archaeological Desk Based Assessment, prepared by CgMS confirms that in terms of relevant designated heritage assets, the application site does not lie within the immediate vicinity of a World Heritage Site, Scheduled Ancient Monument, Historic Battlefield or Historic Wreck site. The application site is not located in an Area of High Archaeological Potential as designated by SCC.

5.55 The Assessment confirms that it can be considered likely that the site has a low to moderate potential for Mesolithic, Neolithic, Bronze Age and Roman remains and a low potential for all other periods. Based on previous anticipated below ground impacts, limited archaeological potential, and development proposals, it is considered unlikely that the proposed development will significantly impact upon below ground archaeological deposits.

5.56 On the basis of the available information it is suggested that no further below-ground archaeological mitigation would be appropriate in this particular instance.

Ecology and Biodiversity

- 5.57 The Ecological Assessment has been undertaken by Aspect Ecology. This confirms that there are no statutory or non-statutory nature conservation designations present within, or adjacent to the site, and none of the designations within the surrounding area are likely to be adversely affected by the proposals.
- 5.58 A Phase 1 habitat survey of the site has established that it is dominated by habitats of negligible to low ecological value. The proposed losses of habitats are therefore of minor significance and will be offset by new landscape planting, incorporating native species. Boundary trees are to be retained under the proposals and will be protected during construction.
- 5.59 No evidence of protected species was found on site, although there was a small number of common bird species, with some trees considered to have low bat roosting potential. In light of this, a precautionary approach has been adopted, with safeguards proposed such as 'soft felling' techniques which will lower any potential effects on roosting bats, and general construction safeguards proposed.
- 5.60 The proposals are therefore considered unlikely to result in significant harm to biodiversity subject to the implementation of appropriate avoidance and mitigation.

6.0 **Community Infrastructure Levy**

- 6.1 The Community Infrastructure Levy (CIL) Charging Schedule for Tandridge District Council came into effect in July 2014. The Community Infrastructure Levy allows Local Planning Authorities to raise funds from developers which carry out new building projects in their area. The funds raised go towards infrastructure which is needed to support the growth of the district, such as schools, GP Surgeries, libraries, open space and transport improvements. The CIL is applied as a charge on each square metre of new building and will be payable by most residential and retail developments in Tandridge. It replaces a number of existing Section 106 contributions - the system previously used to secure funds.
- 6.2 The Charging Schedule confirms that within Tandridge, CIL is payable at £120 per sqm of residential GIA. It is understood that due to the expiration of the gasholder use in 1964, there is no relief in respect of 'existing floorspace'. Through calculations undertaken through the Tandridge CIL calculation tool, the contribution towards community infrastructure from the proposed development is estimated to be in the order of £2.39m. This will be subject to the statutory tests set out in Regulation 122 of the CIL Regulations.

7.0 Conclusion

- 7.1 This Planning Statement provides a detailed assessment of the application proposed at the former Oxted Gasholder and Johnsdale Car Park site in relation to national, strategic and local planning policy and guidance. This statement concludes that the proposed development is acceptable in policy terms.
- 7.2 Importantly, the proposed development provides an opportunity to deliver a wide range of planning and design benefits:
- The demolition of the existing 30m high gasholder on site;
 - The proposed development would create a sustainable, high quality mixed-use, residential development on a brownfield site that is allocated for residential development within the statutory development plan;
 - The proposed development, with the removal of the unsightly gasholder, would significantly enhance the character of the town centre;
 - The scheme will provide landscaped podium gardens with more than double the green amenity space than the approved development (TA:2017/2064); and
 - Maximises a redundant brownfield site whilst responding to the complex site constraints and being sensitive to the local area;
 - Delivers an attractive development in the heart of Oxted town centre with an improved access from the high street
- 7.3 The proposed development is in accordance with policy and has significant merit in planning terms. It will make a material contribution to the housing need of the area and would have no unacceptable impacts upon the local environment or neighbouring properties. The presumption in favour of sustainable development should apply, as promoted through the NPPF.
- 7.4 It is concluded that the proposed development embodies the principles of sustainable development promoted through the NPPF. As such, it is considered that planning permission should be granted for the development.