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Dear David

Proposed Allocation of land for the South Godstone Garden Community – Ecological Evidence Review

Greengage Environmental Ltd was commissioned to review the available ecological evidence provided to support the draft Tandridge District Council (TDC) Local Plan. In particular, Greengage were asked to review the ecological information specifically in relation to the suitability of land around South Godstone, which has been allocated for development as part of a proposed Garden Community. Additionally, commentary on the suitability of other land parcels, in particular land at Redhill Aerodrome and land at Blue Anchor Farm, Blindley Heath was also requested.

The key documents assessed as part of this review include:

- J TDC Draft Local Plan: 2033
- J TDC Sustainability Appraisal (SA) of the Draft Local Plan
- J TDC Habitat Regulation Assessment (HRA) of the Draft Local Plan
- J TDC Water Cycle Study
- J TEP (2017) Ecological Appraisals of Potential Garden Village Locations
- J Taylor Wimpey's Blindley Heath Vision and Delivery Document
- J EAD (2016) Redhill Aerodrome Ecological Deliverability Assessment Summary

A review of the key ecological information for each of the three above-mentioned sites is provided below followed by an overall conclusion.

Site Review

Land at South Godstone

The site is within 2km of two Sites of Special Scientific Interest (SSSI) and is in the outer impact zones of these SSSIs. There is a locally designated Site of Nature Conservation Interest (SNCI) and a Potential SNCI (pSNCI) within the site boundary. These locally designated sites support meadow grassland and/or pockets of ancient woodland, both ecologically valuable habitats.

Further SNCIs and pSNCIs are also present within the wider area.

The South Godstone site is dominated by agricultural grassland with areas of ancient woodland, woodland and a good network of hedgerows. The ancient woodland, woodland and hedgerows all have ecological value.

The TEP report listed above covers the land at South Godstone and considered the site as being 'majority ecologically suitable' which within the TEP report meant that the majority of the site was



suitable for development. The areas of the site not 'ecologically suitable' e.g. that had ecological value were 'pockets of locally important and ancient woodland...'.

Land at Redhill Aerodrome

The site is within 4km of a SSSI and Special Area of Conservation (SAC). However, the TDC SA states 'the HRA has demonstrated how all impacts can be screened out, avoided or mitigated'. There is one SNCI on site in the form of a band of woodland. This woodland is not assigned the category of ancient woodland and although of ecological value, the value is likely to be less than that which would usually be assigned to an area of ancient woodland. Further SNCIs and pSNCIs are also present within the wider area.

The site itself is dominated by amenity and semi-improved grassland associated with the use of the site as an aerodrome, with hedgerows, ditches and small pockets of woodland generally in the periphery of the site or within flood zones that cannot be developed within.

The TEP report considered the Land at Redhill Aerodrome site as 'ecologically suitable' which within the TEP report is understood to mean that the whole of the site was suitable for development.

Land at Blue Anchor Farm, Blindley Heath

The Land at Blue Anchor Farm, Blindley Heath site is located primarily immediately adjacent to Blindley Heath SSSI, a nationally designated site, although with the extension of the proposed development site to the east, the site actually includes a proportion of the SSSI within its boundary. The close proximity of the site to this SSSI, and its inclusion of a proportion within the redline boundary, is considered to increase the potential for any future development to have a negative impact on the SSSI. This is supported by the commentary on page 62 of the TDC Water Cycle Study which states, in relation to the Blindley Heath sites impact on the adjacent SSSI, that 'surface run-off from the potential garden community at Blindley Heath is likely to pass through this site, so the impact on the SSSI could be significant.' Furthermore, the TDC SA states on page 115, in relation to the impact of a garden community at Blindley Heath, that 'there is a risk of nearby development and increased visitor numbers negatively affecting the condition of the designation.' The TDC SA goes on to state on page 121 'the adverse impact on the SSSI is unknown but also a concern for the deliverability of development within this broad location'.

In addition to the adjacent SSSI, the site is also understood to support, or be abutted by, an SNCI and although no ancient woodland is understood to be within the boundaries of the Blindley Heath site, two areas of ancient woodland also abut the site.

The Blindley Heath site itself is understood to be dominated by arable and pasture grasslands separated by a strong network of hedgerows which are linked to ancient woodland on the boundaries on the site.

The TEP report considered the site as being 'majority ecologically suitable' which within the TEP report is understood to mean that the majority of the site was suitable for development.

Conclusion

The most valuable site for ecological reasons is considered to be the Blindley Heath site for the reasons provided above regarding its close proximity to the Blindley Heath SSSI. Its ecological value is



considered to be significantly greater than that at the other two considered sites, namely Godstone South and Redhill Aerodrome because of the proximity to the SSSI. The second bullet point of paragraph 118 of the 2012 NPPF states 'proposed development on land within or outside a Site of Special Scientific Interest likely to have an adverse effect on a Site of Special Scientific Interest (either individually or in combination with other developments) should not normally be permitted. Where an adverse effect on the site's notified special interest features is likely, an exception should only be made where the benefits of the development, at this site, clearly outweigh both the impacts that it is likely to have on the features of the site that make it of special scientific interest and any broader impacts on the national network of Sites of Special Scientific Interest;'. The equivalent statement in the 2018 NPPF can be found at Point b of paragraph 175 which states 'development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it...should not normally be permitted...'. Therefore, due to the potential risk of any proposed development negatively affecting the condition of the SSSI, Blindley Heath is considered to be an inappropriate location for a garden community, with respect to ecology.

The remaining two sites, namely Godstone South and Redhill Aerodrome both have large areas which are of low ecological value. However, Godstone South is considered to have greater ecological value primarily due to the presence of ancient woodland within the site boundary. The fifth bullet point of paragraph 118 of the 2012 NPPF states 'planning permission should be refused for development resulting in the loss or deterioration of irreplaceable habitats, including ancient woodland and the loss of aged or veteran trees found outside ancient woodland, unless the need for, and benefits of, the development in that location clearly outweigh the loss;'. The equivalent statement in the 2018 NPPF can be found at point C of paragraph 175 which states that 'development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists;'. Therefore, given the fact that the South Godstone site contains ancient woodland within its boundary and Redhill Aerodrome does not, in accordance with the 2012 and 2018 NPPF, Redhill Aerodrome should be chosen over South Godstone with respect to ecology in terms of the presence of ancient woodland. Furthermore, given South Godstone was considered to be of 'majority ecologically suitable' within the TEP report and Redhill Aerodrome was considered to be 'ecologically suitable', we consider it reasonable to conclude that the TEP report also considered South Godstone as having more ecological value than Redhill Aerodrome.

Therefore, from an ecological point of view and based on the documents reviewed, the most suitable site to be allocated for a new garden community development is considered to be the Land at Redhill Aerodrome. This should also be in line with NPPF 2012 paragraph 110 which states '...Plans should allocate land with the least environmental or amenity value, where consistent with other policies in this Framework' and NPPF 2018 paragraph 171 states 'plans should...allocate land with the least environmental...value', in terms of ecology value.

Yours sincerely

Mike Harris
Associate

For and on behalf of Greengage Environmental Ltd