Town & Country Planning Act 1990

Draft Tandridge Local Plan Consultation
(Regulation 19)

REPRESENTATION IN RESPECT OF CHAPEL ROAD, SMALLFIELD (SMA 013)

Prepared on behalf of Rydon Homes

September 2018
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1.0 INTRODUCTION

1.1 These representations have been prepared by Enplan on behalf of Rydon Homes Ltd in response to the Regulation 19 consultation of the Tandridge Local Plan (TLP) and specifically relate to land west of Chapel Road in Smallfield.

1.2 Rydon Homes have always sought to assist and engage with the District Council throughout the preparation of the District Plan, providing comments whenever invited to do so.

Tests of Soundness

1.3 This consultation seeks comments on whether the proposed plan meets the tests of soundness, as set out at para.182 of the National Planning Policy Framework 2012 (NPPF1), and therefore can be said to have been soundly prepared. In order to pass the test of soundness the plan must be:

- **Positively Prepared:** the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;

- **Justified:** the plan should be the most appropriate strategy when considered against reasonable alternatives, based on proportionate evidence.

- **Effective:** the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities.

- **Consistent with national policy:** the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.

1.4 This representation considers whether these tests have been met.

Overarching Matters

1.5 Rydon Homes is a member of the Developers Forum. This is a group created to work with officers and Members of Tandridge District Council to ensure that the draft Plan achieves the core aims of delivering housing as set out in the NPPF and Planning Practice Guidance (PPG) and results in a plan that is the best it can be to provide certainty for the Council, the residents of the District and, the development industry.

1.6 The Forum is modelled on a similar approach adopted recently in relation to local plans in Guildford, Waverley and Mid Sussex, and is advised principally by Judith Ashton Associates and Cratus Communications alongside Lichfields, RPS, and Neame Sutton Limited.
Currently, the Forum consists of the following companies alongside Rydon Homes: Cala Homes; Catesby Estates Plc; Crest Strategic; Croudace; Fairfax Properties; Land Group UK; Millwood Designer Homes; Rydon Homes; Taylor Wimpey Strategic Land; Thakeham Homes; and Wates Developments.

In order to assist the Council and to make the most efficient use of time at the forthcoming Examination, representations have been submitted from the Forum in response to this consultation dealing with any overarching matters jointly and in particular how the plan deals with the objectively assessed housing need (OAN) for the district.

The main points made by the Forum in relation to the OAN are as follows:

- Para 11.6 of the TLP advises that ‘…Tandridge District Council had an OAN of 9,400 units for the Plan period between 2013 and 2033, or 470 homes per year…’

- The plan confirms in Policy TLP01 that 6,056 homes will be delivered within the plan period (2013 to 2033) i.e. 303dpa.

- The TLP does not demonstrate why the district cannot accommodate more than 303dpa, or how the 35.5% (i.e. 3,344 dwellings) shortfall is to be addressed.

- The current provision would result in a shortfall of some 50.27% of the OAN as calculated by Lichfields and RPS on behalf of the Forum.

- The District Council has failed to look to identify sites in accordance with the PPG i.e. considering what action would be needed to remove the constraints identified in the plan; and/ or revisiting assessments, and for example changing the assumptions on the development potential of particular sites (including physical and policy constraints).

- Overall it is considered that the plan is not ‘positively prepared’, and therefore contrary to national government guidance and unsound.

**SMA 013 (Chapel Road)**

Rydon hold an interest in land to the west of Chapel Road and north of Cary’s Wood in Smallfield, and are promoting it for residential development. It is referred to as SMA 013 throughout the evidence base supporting the proposed TLP and it is also referred to as SMA 013 in this representation.

The site extends to approximately 15 ha and could accommodate around 300 homes with associated uses. There is also scope to provide on-site facilities, potentially linked

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1 Refer to representations made by the Forum in response to the Regulation 19 consultation for the full case with regard to the OAN and the overarching approach.
with the primary school in Smallfield. It is well related to the settlement of Smallfield and adjoins the settlement boundary on its southern and part of its western boundaries with frontage development along the east side of Chapel Road extending northwards for almost the full length of the eastern site boundary.

1.12 It has good access links to the village centre and an extensive frontage to Chapel Road where RPS Highway Consultants have established that two access points can be readily accommodated and with a bus stop on Chapel Road.

1.13 The site is generally unconstrained being in Flood Zone 1 and comprising a single parcel of Grade 3B agricultural land with no ponds, woodland or important trees or hedgerows within the main body of the site.

1.14 Smallfield is a ‘Semi-Rural Service Settlement’ or Tier 2 settlement alongside Godstone and Lingfield. Policy TLP01: Spatial Strategy confirms that ‘in the short to medium term development is directed towards the most sustainable settlements which are our urban (Tier 1) and semi-rural service settlements (Tier 2)’. The TLP currently provides for 533 new homes at the Tier 2 settlements.
2.0 THE EVIDENCE

2.1 One of the tests of soundness is that a plan must be justified. For it to be justified, the plan should be the most appropriate strategy when considered against reasonable alternatives, based on proportionate evidence [emphasis added].

2.2 It is therefore essential that reliable, accurate and sound evidence is used to support the plan. With regard to SMA 013 a number of issues are apparent in the application of the evidence that has resulted in the site’s exclusion as a site allocation in the TLP.

2.3 This section considers the flaw’s in the evidence and provides our evidence to support the assertions made.

Landscape

2.4 Allen Scott (AS) have undertaken a further landscape capacity assessment of SMA 013 (Appendix 1). As part of the Regulation 18 representation AS undertook a review of the Council’s LCSS in December 2016 and considered that the site’s landscape capacity was ‘medium-high’ rather than ‘low’ capacity as set out in the LCSS.

2.5 AS’s further assessment maintains their earlier assessment noting that the Council’s rebuttal of their Regulation 18 submission (Appendix 2) did not deal with the specific issues raised and simply re-asserted the previous assessment. AS comments on a number of considerations including ‘size of sites’, ‘road frontage’ and ‘land management’ and considered that a bias against SMA 013 was applied in assessing and comparing the site with other potential sites. As an example, AS considered that the Council over-emphasised the visibility of the site that effectively placed SMA 013 as having a low capacity of the site which, in turn, influenced other judgements of the LCSS. The assessment did not consider mitigation and its contribution to reducing landscape impacts including from the road frontage. SMA 013 has significant potential to provide new planting behind the existing wide verge, existing hedgerow and frontage trees to provide an effective screen to new development and enhance the sense of arrival to the village for the north.

2.6 SMA 013 was assessed by AS as having a higher landscape capacity than the allocated greenfield sites of HSG01 and HSG03. Notwithstanding this, it is considered that the emphasis that the Council gave to landscape capacity was disproportionate in the context of an undesignated landscape where there will inevitably be some landscape impact on development of a green field site.

Flood Risk

2.7 Parts of Smallfield are vulnerable to flooding (refer flood event in 2013/14) and flood risk is therefore a key aspect of the site selection process.
2.8 TDS (Southern) Ltd prepared a Drainage Analysis and Strategy in November 2017 – see Appendix 3. An update report by TDS (dated August 2018) is at Appendix 4.

2.9 The sites currently allocated in the TLP for Smallfield are in Flood Risk Zones 2 and 3 or are very close to them. It is considered that development of these sites would potentially exacerbate current flooding problems.

2.10 By comparison, not only is SMA 013 in Flood Risk Zone 1, it is further away from the area of flooding and importantly, has the potential to deliver a solution that would help significantly to provide measures for flood reduction that would improve existing conditions, something that was offered to the Council when the 2016 HELAA was being prepared and in response to the Regulation 18 consultation. There is no explanation in the Council’s evidence as to why HSG 03 has been identified, over and above any alternative site at Smallfield, as a site suitable to ‘enable flood mitigation for the wider area’.

**Highways**

2.11 RPS Transport has undertaken an assessment (Appendix 5) of the traffic impacts of the two allocated green field sites in Smallfield; HSG01 and HSG03 which the TLP identifies for 160 and 120 houses respectively. Both sites are located on the east side of Smallfield on the north and south sides of Plough Road.

2.12 In view of the traffic generated from these proposed developments and the direction of the movements, RPS consider there would be severe impacts upon the already highly congested staggered junction of Plough Road/Wheelers Lane/Redehall Road. This would be contrary to the guidance at para. 109 of the NPPF.

2.13 Development of SMA 013 of up to 300 dwellings (ie a similar level to the allocated green field sites) would generate a similar level of traffic. However, and importantly, this would result in a 65% reduction in traffic using the Plough Road/Wheelers Lane/Redehall Road junction compared to combined HSG01 and HSG03 sites. This represents a reduction such that, in highway management and safety terms, SMA 013 is a significantly preferable location to accommodate the currently identified level of new housing for Smallfield.

2.14 With regard to additional development being required over and above the current level in the TLP, RPS note that HSG01, HSG03 and SMA013 could, collectively, deliver a range of highway improvements and opportunities in a managed viable way. These would include more significant highway improvements as well as improvements to pedestrian/cycle and public transport accessibility.
Other Matters

2.15 Due to current farming activities, SMA 013 has limited existing ecological value apart from its hedgerow boundaries. However, new housing would create the opportunity for the creation of new areas of wildlife habitat that would significantly enhance the site’s overall biodiversity value.
3.0 GREEN BELT

3.1 The site lies within the Green Belt. The settlement of Smallfield was inset from the Green Belt in 1986 and development has occurred within the settlement boundaries since then. This means the southern, and southern part of the western boundary of the site which abuts the settlement, also forms the edge of the current Green Belt designation.

3.2 The Council adopted a staged approach to the assessment of the Green Belt and this has resulted in several failures/errors that have led to an unsound plan being prepared. For clarification, the stages undertaken are:

(i) Green Belt Assessment (2015) (GBA1) made recommendations as to where there are areas of the Green Belt that serve a critical purpose more or less effectively and should be considered for further and more detailed assessment. This assessment identified an area to the south of Smallfield to be the subject of further assessment concluding:

‘When the Green Belt was first designated in the south of the District in 1974, Smallfield was washed over by the Green Belt. In 1986, Smallfield had grown substantially that it was removed from the Green Belt. There is an extension to Smallfield that extends along Redehall Road, Park Road and Geary Close. It cannot be identified if they existed prior to the designation of the Green Belt and as such has been identified as an area for further investigation’

(ii) Green Belt Assessment Part 2 (2016) (GBA2) considered the areas identified for further investigation in the 2015 study. It concluded that the area identified should not be recommended to be inset from the Green Belt.

(iii) Green Belt Assessment Part 3 (June 2018) (GBA3) looked at each site in turn, considering which sites demonstrated the exceptional circumstances that could justify release from the Green Belt [our emphasis]. This assessment did not consider SMA 013 and as a result it was not considered as to whether it, or part of it, could demonstrate the required exceptional circumstances.

3.3 This section will outline the flaws in the approach and methodology of the Council’s Green Belt review.

Defining Exceptional Circumstances

3.4 Exceptional circumstances relating to the release of Green Belt land are not defined in the NPPF. Accordingly, the Council set out the factors it considered fundamental in terms of exceptional circumstances in the GBA3.
3.5 It is noted that the Forum has submitted representations confirming the criteria for establishing whether exceptional circumstances exist was too stringent and should be reviewed.

Selecting sites to consider exceptional circumstances

3.6 Notwithstanding the comments relating to the criteria for defining exceptional circumstances, an error has occurred which has resulted in SMA 013 not being assessed against the exceptional circumstances.

3.7 Set out below is the methodology used for deciding which sites be included in the assessment.

Figure 1 - Flow diagram of site selection methodology extracted from Green Belt Assessment Part 3 pg.39
[stage numbering added for referencing below]

3.8 We have taken SMA 013 through each stage of the flow diagram site selection process and this is provided below.
**Stage 1 - is it suitable and available?**

3.9 Using the latest information within the evidence base, the HELAA 2018 confirms that SMA 013 is *'Developable… the site is considered to be developable and capable of coming forward after 5 years, should the site be allocated in the Local Plan.'*

3.10 The NPPF explains at footnote 11 to para. 47 that for a site to be considered deliverable it *"should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that development will be delivered on site within five years and in particular that development of the site is viable. Sites with planning permission should be considered deliverable until permission expires, unless there is clear evidence that schemes will not be implemented within five years".*

3.11 It is therefore clear that SMA 013 should proceed to Stage 2 of the selection process.

**Stage 2 - is it ecologically suitable for development and does it have landscape capacity for development?**

3.12 This stage seems superfluous as for the site to be considered developable in the HELAA 2018 it must be considered suitable with regard to both of these *'criteria'. It is illogical that a site could be a 'yes' to Stage 1 and then a 'no' to Stage 2. Notwithstanding this, and for the purposes of this exercise the Council's methodology is applied.*

3.13 With regard to ecology, as and referred previously, the site has with limited ecological value. Indeed, the Council’s own Site-based Ecology Assessment 2016 assessed the development potential of SMA 013 as being suitable with minimal constraint. The site was described as being improved grassland of very low ecological value. The Area Analysis stated:

“The site is suitable for development. On a site of this scale, it would be possible to retain the few existing features of interest and create a new landscape structure that adds habitat diversity. The site area is 14.95 ha and a typical family housing density of 30 dph would normally allow incorporation of ecological areas into public open space. The site has an overhead line which would be retained as open space and could include hedges, swales and wildflower grassland. On the basis of a typical family housing density of 30 dph, the site could accommodate up to 450 units with a public open space structure that included sufficient habitat provision.”

3.14 With regard to landscape capacity, whilst it is apparent that Rydon and the Council differ on the level of capacity of the site, both agree through the studies and representations that the site has some capacity.

3.15 It is understood from the Regulation 18 consultation that as a result of the 'Low' capacity assigned to it by the Council, the site failed to progress to Stage 3 of the selection process. However, even if TDC do not accept Rydon’s landscape evidence prepared by Allen Scott which concludes the site has 'Medium-High' capacity the Council’s own
methodology confirms that where the site has capacity it should move on to Stage 3. SMA 013 was therefore excluded by the Council incorrectly and SMA013 should have progressed to Stage 3 of the selection process.

**Stage 3 - does it accord with the Preferred Strategy?**

3.16 The document ‘Our Local Plan: Preferred Strategy (March 2017)’ sets out the Council’s adopted preferred strategy. Para. 6.4 summarises the strategy as follows:

‘The Local Plan will provide much needed homes and infrastructure by delivering a strategic development which accords with the principals of a Garden Village for the long-term, and to focus development to our urban and semi-rural service centres for the shorter term…’

3.17 SMA 013 abuts the built up area of Smallfield which is a semi-rural service centre and therefore should development of this site occur it would accord with the Preferred Strategy (subject to exceptional circumstances).

3.18 Accordingly, it is clear that by using the Council’s own evidence and methodology, SMA 013 should have been considered in GBA3 as to whether it meets the exceptional circumstances. It was not. This error resulted in the site not being considered in whole or in part against the exceptional circumstances and therefore incorrectly excluded from GBA3 and consideration for allocation in the local plan.

3.19 Had the methodology been correctly applied and SMA 013 been included for consideration against the exceptional circumstances in GBA3 it is considered that it would have been assessed as meeting the exceptional circumstances necessary to amend the Green Belt boundary. We have undertaken this exercise and our assessment in accordance with GBA3 is included in Appendix 6.

**Conclusion in respect of Green Belt**

3.20 It is clear that the methodology applied by the Council in reviewing the Green Belt, both in terms of selecting sites for consideration and the assessment itself, is flawed.

3.21 The error with regard to site selection has impacted directly on SMA 013 which is able to deliver 300+ homes towards the unmet OAN. This is compounded by the Council’s approach to the Green Belt that places too high a bar on its protection in the context of the requirement to meet identified housing need.

3.22 This is not a positive approach to plan making and is contrary to the aims and objectives of national guidance.
4.0 SUSTAINABILITY APPRAISAL

4.1 The purpose of the sustainability appraisal process is to appraise the social, environmental and economic effects of a plan from the outset. In doing so it will help ensure that decisions are made that contribute to achieving sustainable development.

4.2 The Sustainability Appraisal (SA) is integral to the plan making process. It should perform a key role in providing a sound evidence base for the plan and form an integrated part of the plan preparation process. The sustainability appraisal should inform the decision-making to facilitate the evaluation of reasonable alternatives and demonstrate that the plan is the most appropriate given the reasonable alternatives.

4.3 There has been a number of flaws in the SA’s produced throughout the development of the TLP. The SA published alongside the Regulation 18 SA did not take account of the results of the Council’s own evidence base, principally their landscape study (LCSS). At that time Rydon objected on the basis that too much weight had been given to the ‘Low’ landscape capacity in rejecting SMA 013 in its entirety.

4.4 A revised SA assessment has been prepared to illustrate the impact of applying their own evidence. A simple scoring system was applied with the aim of ranking the sites to establish how SMA 013 compared to other sites in the immediate area around Smallfield. The representation submitted is set out in Appendix 7.

SA Assessment of SMA 013

4.5 Appendix 8 of these representations include an extract from the Regulation 19 SA and applies a simple scoring system to provide a comparison of the sites. This demonstrated that in SA terms the overall impact of delivering residential development on SMA 013 will be the similar to residential development on SMA030. SMA030 is allocated for development in TLP under Policy HSG 03. From what can be seen there is no obvious reason based on the evidence prepared by the Council or reasoning in the SA for SMA 013 to have not been wholly or partly allocated in the TLP.

4.6 Appendix 8 also provides an alternative Regulation 19 SA taking in account Rydon’s own evidence. This again applies a simple scoring system in order to more easily compare the alternatives in/around Smallfield. This demonstrates that overall SMA 013 has:

- Similar impacts to SMA004 and higher than SMA008 and SMA040 which collectively form the housing allocation under Policy HSG 01.
- Fewer negative impacts than SMA030 which forms the allocation included under Policy HSG 03.
Whether one uses the Council’s or Rydon’s evidence to assess SMA 013 it is clear that the impacts of developing the site are not significantly different from those that have been allocated in the plan.

It is recognised that the simple scoring method has limitations, and that applying equal weighting to each category in the SA matrix is questionable, but it does serve a valuable purpose in providing a starting point to compare the overall impact each site would have against the sustainability objectives.

This starting point clearly demonstrates that SMA 013 should be considered on a par, if not ahead of the sites that have been included in the Regulation19 TLP.

**Failure to consider the reasonable alternatives**

The Council have failed through the SA process to consider SMA 013 for allocation as it was excluded from the assessment based on the flawed GBA as outlined earlier. This has meant the Council have failed to consider the site as a reasonable alternative when planning for housing supply.

Furthermore, no attempt has been made to assess whether part or all of the site could be developed. Whilst we disagree with it, the Council’s landscape evidence suggests that the site has low capacity for some development – the next step when seeking to deliver OAN in the face of the constraints set out by the Council, would be to identify where that capacity is and then, if appropriate, allocate part of the site, thereby providing a contribution towards the OAN. However, this has not been done and the Council’s landscape assessment falls short of confirming the amount of development it considers may be appropriate in landscape terms.

The Council has failed in its duty to deliver a plan that is the most appropriate strategy when considered against reasonable alternatives and based on proportionate evidence.
5.0 CONCLUSIONS

5.1 SMA 013 is in a wholly sustainable location and can deliver some 300+ homes towards the significant level of unmet OAN that the TLP currently provides. As has been demonstrated through the assessment provided, the site is preferable than the green field sites allocated in the TLP for Smallfield. Overall the impacts of the site’s development on drainage, highways and landscape would be significantly less than the allocated sites.

5.2 The Council’s failure to apply their own methodology for selecting sites to be considered in GBA3 resulted in SMA 013 not being included in the assessment. It would appear that ‘low’ landscape capacity was misinterpreted by the Council to mean ‘no’ landscape capacity. By correctly applying the Council’s evidence SMA 013 should have been assessed in the GBA3 study.

5.3 Had SMA 013 been considered under GBA3 it would have met the exceptional circumstances required for Green Belt release. Furthermore, the benefits of developing the site would have been able to have been properly considered which would have further secured its positive assessment for a housing allocation.

5.4 SMA013 is considered have fewer harmful impacts than those sites proposed to be allocated under Policies HSG 01 and HSG 03. As such, should the OAN figure adopted by the Council be considered appropriate we consider that SMA013 should replace HSG 01 and HSG 03 in the TLP.

5.5 In the event that the Council are required to deliver additional housing towards its OAN, it is considered that all or part of SMA 013 should be identified for housing development with HSG 01 and HSG 03 being utilised as required to meet the revised OAN.

5.6 SMA 013 provides the opportunity to make a meaningful contribution towards the unmet OAN whilst delivering a range of benefits for Smallfield including drainage improvements, highway improvements and other community facilities, possibly including educational facilities.

Attendance at Examination

5.7 Attendance at relevant hearing sessions of the Examination is requested.
Appendix 1

1.0 INTRODUCTION

1.1 Allen Scott undertook a review and critique of Tandridge DC’s/HDA’s Landscape Capacity and Sensitivity Assessment (LCSS) in December 2016 on behalf of Rydon Homes to highlight seeming discrepancies in the assessment of various sites in Smallfield and particular SMA013. The LCSS assessed SMA013 as having a ‘low’ capacity for development which appeared out-of-kilter with its assessment of other very similar sites and SMA013’s evident lack of clear landscape constraints.

1.2 The LCSS scoring method was found to be very sensitive, highly subject to judgement and with some inconsistencies applied across various sites. The LCSS scored SMA013 just one point away in the sensitivity and value judgements from falling into a ‘medium’ capacity.

In the review, the re-assessment of the capacity of the site recommended the result be revised as follows:

Moderate sensitivity x Slight value =

Medium-high landscape capacity

1.3 HDA produced a rebuttal to consultation responses, including the review, and disappointingly concluded no change was required despite the over-riding comparisons with other sites assessed as having higher capacity. In HDA’s rebuttal the specific issues raised in the review were not dealt with, merely the original assessment factors re-asserted.

2.0 REASONS FOR REVISING THE LANDSCAPE CAPACITY

2.1 Several factors were found in the LCSS that influenced the judgement and led to some sites with very similar landscape qualities being rated with higher capacity. In summary the review raised a number of factors that appeared to slew the findings of the LCSS:

2.1.1 North and South of Smallfield: More sites in the south were given a higher rated capacity which tended to be the smaller sites. There is no over-riding landscape reason for this, the TDC Landscape Character Assessment makes no distinction between the quality and value of the landscape to the north or south of Smallfield. A distinction that does exist is that the field
pattern around the southern sites is smaller and more intricate. This might suggest an ability to absorb development but unequivocally and equally suggests that there are more landscape components including hedgerows and trees that would be affected.

2.1.2 **Size of Sites:** More smaller sites were given a higher rated capacity. This may suggest a reasonable bent towards smaller sites appearing more discreet, imagining that development would always be less prominent in the landscape if it is smaller. However this clearly raises questions as to whether the development of a number of smaller sites spread through the village might not have a higher cumulative impact than one or two larger contained sites with greater capacity for land efficiency and on-site mitigation.

A capacity grading across these larger sites would on a common sense level at least suggest a potential higher capacity where the site joins existing settlement edges becoming less so the further away the site extends. The larger sites may therefore offer much greater flexibility and higher levels of mitigation than the smaller sites.

2.1.3 **Road Frontage:** Sites with less road frontage were given a higher rated capacity. Two related factors which form part of the LCSS assessment are the visibility of the site and public access of the site. Again it might be reasonable to accept that those sites with a greater road frontage are inherently more visible and therefore development more prominent. However this disguises the important distinction between a glimpse across a field whilst driving into the village edges and a more valuable experience of enjoying walking across the field on a public footpath. The ‘low’ capacity for SMA013 appears to be largely because of the change in character that will be seen by road users as they drive into the village. Compare this to other sites where a public footpath network passes through the middle (such as SMA021 with a ‘medium-high’ capacity) where changes in character would be catastrophic for footpath users.

2.1.4 **Land Management:** Sites that are not well maintained, resulting in an overgrown and sometimes unsightly appearance, tended to have a higher capacity rating. For example if native field hedgerows have been allowed to grow to a height of 3m+ this may serve to screen the site from the adjoining road (such as SMA031, medium-high capacity) but ultimately leads to a loss of density at lower levels and a greater risk of future residential pressure to cut hedgerows down. Similarly sites that have returned to rough grass (such as parts of SMA004) or are perceived as ‘untidy’ horse paddock. The hedgerow bounding SMA013 could have been allowed to grow up and additional tree planting readily added to it, which would have screened much of the view from the road. Thus a change in any management regime can have positive or negative effects on any piece of land within one or two seasons, hence must be viewed as a being in a temporary and reversible state.

At face value it seems unreasonable to reward poor or basic land management with a presumption of development potential.
3.0 HDA'S REBUTTAL NOTES

3.1 The rebuttal notes do not deal with any of the above factors referring only to the summary in the review the LCSS factors.

3.2 The Landscape Sensitivity Assessment

3.2.1 SMA013 is just one point short of falling within the ‘moderate’ landscape sensitivity category. With reference to the site-by-site comparisons in the reviews the scoring within the following factors demand some re-consideration when compared with scoring on other sites with very similar characteristics:

- **Inconsistency with existing settlement form / pattern.** The rebuttal re-asserts that there is limited relationship with the existing development on the southern boundary because of the vegetation whilst making no mention of the greater absence of vegetation along the longer Chapel Road frontage opposite existing housing. The southern portion is well related to the settlement with existing development along all of the southern edge, most of the eastern edge and part of the west edge. The rebuttal states that development will ‘break through this northern edge’ but fails to mention the constraints of the pylons in the northern portion and the ‘containment’ along the northern edge shown on their own Smallfield Analysis Drawing Area 14 (Page 240 LCSS). This is also at odds with the statement on lack of visibility in the wider area in ‘Contribution to the setting of surrounding landscape / settlement’ and most bizarrely and entirely inconsistent with the now allocated SMA030 (as HSG03) which is open along its long eastern boundary.

- **Contribution to the setting of surrounding landscape / settlement** – Notwithstanding the point above it is acknowledged that there is some contribution but that it is limited to this immediate short length of Chapel Road. Hence to score almost the maximum is over-stating the contribution. The rebuttal states that it is the rural setting to Smallfield but this is presumably as only perceived from the road as both allocated sites SMA030 (as HSG03) and SMA008 (as part of HSG01) also extend into countryside, the latter extending development along Plough Road, a main route into the village and the former extending development along the local road Meadow View which currently enjoys a wide open aspect.

- **Views (visual sensitivity)** – Overlapping with the above point the view is significantly over-stated being limited to users of this short length of road and contained by western boundary vegetation and urban edges. Glimpsed views from the nearby part of the Tandridge Border Path into the site are readily mitigated and the level of concern is entirely inconsistent with sites such as SMA031 which was rated with a medium – high capacity but also has the Tandridge Border Path along its western side. Similarly it is inconsistent with SMA021, also rated medium – high capacity, which has a public footpath running right through the middle of it.

- **Potential for Mitigation** – The existing eastern boundary vegetation, width of boundary, size of site and the physical development constraints of the pylons make mitigation eminently achievable to at least the same extent as other large sites and more so than the smaller ones. Hence to score almost the maximum is vastly over-stating the limitations that
mitigation measures could and would have. From the rebuttal notes this appears to be due to there being 'no internal boundaries upon which to establish new landscape structures'. If it were impossible to establish new landscape structures this would omit any large site anywhere and is also fairly inconsistent with the allocation of SMA030 (as HSG03) which has but one small hedgerow across the width in the upper third of the site and would not be sufficient to make a clarifying landscape structure within a new housing development.

- Overall – The landscape sensitivity score should be reduced to reflect a **moderate** sensitivity as recommended in the review.

### 3.3 The Landscape Value Assessment

3.3.1 SMA013 is also just one point short of falling within the ‘moderate’ **landscape value** category. With reference to the site-by-site comparisons in the review the scoring within the following factors demand some re-consideration when compared with scoring on other sites with very similar characteristics:

- *Recreation and public access / locally valued spaces* – the rebuttal repeats that the site has visual value from the northern approach, which is not untrue, but this ‘double counts’ the same point made in the sensitivity factors above and is considered of little weight under this heading of recreation and public access. The rebuttal also states there is value in its ‘informal physical recreational value’ but this is private land with no public access. Any consideration of informal access by dog walkers should surely be applied the same way for the allocated sites SMA030 (as HSG03) and SMA008 and SMA004 (as HSG01). In the LCSS other spaces that might be equally or more valued spaces such as the cricket club is not even mentioned in the assessment of SMA020.

- *Perceptual aspects* – Whilst it is agreed it is an ‘average’ landscape in many regards the visual detractors listed in the LCSS, especially the pylons along the northern portion of the site, but also the housing and road, are considered to bring the perceptual aspects into a slightly less than average score.

- Overall – The landscape value score should be reduced to reflect a **slight** value as recommended in the review.

### 4.0 COMPARISON WITH SMA030 (allocated as HSG03)

4.1 The review compared all of the assessed sites and in summary for SMA030 found:

4.2 SMA030 is less contained and adjoins open countryside to the east and north. It is rated as having a ‘medium’ landscape capacity for development and hence judged less sensitive and less valuable than SMA013.
4.3 It is well associated with housing along its western boundary although these have a more open outlook than those houses around SMA013 such that potential visual impacts could be higher.

4.4 Its long eastern boundary adjoins open fields and following site checks it is clear that views would be readily available from the footpath running parallel with the boundary to the east which currently enjoys an open and largely rural aspect. Views would also be available from some parts of Cogman’s Lane to the east which is also a distinctive rural lane.

4.5 There is no containment to the north such that open fields to the north and up to the high ground are also likely to be affected.

4.6 With reference to the LCSS Smallfield Analysis Plan (LCSS page 240) the following landscape components, not present on SMA013, bear some consideration:

- Ancient Woodland touching the north-west corner
- A significant water course contiguous with the northern boundary
- No containment shown – and thus views from high ground to the north

4.7 In addition the following differences deserve consideration:

- An existing hedgerow crosses the northern portion and would need to be breached to allow development
- Whilst a country pub and car park fronts the site between the road any housing would still be partially visible on the approach into Smallfield
- Only aircraft noise is noted as a detractor
- There is potential imbalance of the settlement pattern extending the ‘rectangular’ form further to the east

4.8 SMA030 scores the same as SMA013 in the landscape value assessment and two less in the landscape sensitivity assessment. Other than the Chapel Road view it is very hard to understand how SMA013 could possibly be considered more sensitive given the more open countryside nature of SMA030 and the acknowledgement within the LCSS of additional landscape components and a lack of containment.

4.9 This comparison also points to SMA013 being miscategorised and that it should be rated at least on an equal capacity footing as SMA030 if not higher.

5.0 COMPARISON WITH SMA008 & SMA004 (northern part only) (allocated as HSG01)

5.1 Whilst SMA008 has good potential for development it is still relevant to highlight that there would be some character changes to Plough Road, a main route into Smallfield, and some visual impact on adjoining houses. Also the point regarding the cumulative effect of small sites required to fulfil housing demand and the current management of the site being an influence, should also be noted.
5.2 The removal from allocation of the southern part of SMA004 avoids the direct comparison of impacts on footpaths and views from approaches although the site still abuts open land with only isolated farmsteads on the eastern and southern edges and will influence the footpath to the south and south-east. An additional piece of land, assessed in an addendum to the LCSS as SMA040, is also included in the site allocation of HSG01.

5.3 SMA004 is also partially comparable with SM013 in terms of its relationship to the existing settlement pattern but interestingly has much less existing housing adjoining it, the western boundary abutting a field within the suburban area which forms SMA040. This boundary between the sites comprises a significant wooded hedgerow which marks the edge of the existing built edge and would become swallowed within the development. Whilst this may be justified in terms of it becoming landscape structure for new housing in effect it will become isolated and likely be under threat in the long term due to management issues and overshadowing.

5.4 The original larger SMA004 site area scored considerably less than SMA013 in both the landscape sensitivity and landscape value assessment whilst being comparable in many ways and each sharing other positives and negatives. With a smaller site the extension of housing still infringes on open fields and continues to narrow the gap between Smallfield and the cluster of development to the south and isolated farmsteads to the east.

6.0 CONCLUSIONS

6.1 With regard to SMA013 specifically, sites that are on the cusp of scoring are particularly vulnerable to being miscategorised through the LCSS process due to the multiple and complex factors that are attempted to be balanced in the tabulated assessments.

6.2 In the review of the LCSS the capacity ratings were analysed for each site which showed up some decision patterns that may indicate factors, other than those listed in the table, have over-influenced subjective judgements. This may not be a problem if still consistent but in reviewing site by site comparisons both subtle and more significant inconsistencies in the judgements were borne out.

6.3 The HDA rebuttal notes do not respond to these but focus on the original LCSS assessment factors,

6.4 The LCSS over-emphasises the visibility from Chapel Road and the importance of that view, which subsequently influences many of the other judgements, including the potential for mitigation. The character of the approach may change with development but this is true of most of the sites adjacent to or near roads and does not mean that a change in character is always for the worse. The site has generous verges, hedgerow and trees and ample space for significant off-sets and further planting to envisage a sensitive and discreet scheme that could enhance the sense of arrival into the village.

6.5 In direct comparison to SMA030 (allocated as HSG03) there are many inconsistencies particularly the lack of containment and infringement on countryside.
6.6 In the review of SMA013 the site was re-scored to reflect better consistency with the other sites and this is appended below. The landscape capacity for housing development of this site has been revised by combining the re-scored sensitivity and value assessments set out below using the LCSS capacity matrix table.

6.7 It is recommended that the capacity of the site be revised as follows:

**Moderate** sensitivity x **Slight** value =

**Medium-high** landscape capacity
Site SMA 013; RECOMMENDED RE-ASSESSMENT

Landscape Sensitivity:

<table>
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<th>Inherent landscape quality (intactness and condition)</th>
<th>Ecological sensitivity</th>
<th>Inconsistency with existing settlement form/ pattern</th>
<th>Contribution to separation between settlements</th>
<th>Contribution to the setting of surrounding landscape/settlement</th>
<th>Views (visual sensitivity)</th>
<th>Potential for mitigation</th>
<th>Overall sensitivity judgement</th>
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<td>1</td>
<td>3</td>
<td>4</td>
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Landscape Value:

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<th>Landscape designations</th>
<th>Ecological and other designations</th>
<th>Local distinctiveness</th>
<th>Any historical / cultural / literary associations</th>
<th>Contribution to setting of ‘outstanding assets’</th>
<th>Recreation and public access / locally valued spaces</th>
<th>Perceptual aspects</th>
<th>Overall value judgement</th>
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</thead>
<tbody>
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<td>1</td>
<td>2</td>
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Appendix 2

Tandridge District Council site comments following Regulation 18 consultation (01/07/2018)
STATEMENT OF CONSULTATION
LOCAL PLAN: SITES CONSULTATION
(REGULATION 18)

July 2017
<table>
<thead>
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<th>Site Reference</th>
<th>SMA 013</th>
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</tr>
</tbody>
</table>

### Key comments

#### General
- There is a Byway running along the western edge of the site.
- A development of around 30 units located in the southern section of the site would enable some development provided it is laid out as a continuation of the shape of the boundary from Hayes Walk.
- A much smaller development of around 30-50 units located in the southern section of the site would provide the opportunity of houses being provided, without the Green Belt being significantly affected, or changing the feel of the parish.
- The site should not be included for further consideration.

#### Infrastructure
- Considerable improvement to drainage infrastructure will be needed if both the new developments and the rest of Smallfield are to avoid real flooding.
- Antiquated drainage system struggles to cope currently and by adding to it will cause further misery to existing houses and to the new ones.
- School and doctors surgery is running to near full capacity. If the population expands in the village, this situation can only get worse. Surgery buildings and car park have little scope for further expansion.
- Increase in population will inevitably bring more pupils to school. Porta cabins are already used.

#### Comments from Thames Water Utilities
- The waste water network is unlikely to support the demand anticipated from this development.
- Strategic drainage infrastructure is likely to be required.
- Minor infrastructure upgrades may be required.
- It is important not to under estimate the time required to deliver necessary infrastructure. For example: Sewage Treatment Works upgrades can take 18 months to 3 years to design and build.

#### Green Belt
- Inappropriate development on Green Belt land will create further urban sprawl to the detriment of the settlement.
- Relieved that the site has been removed from areas for consideration. These would have been a serious
infringement of Green Belt policy and completely unsustainable within the National Planning Policy Framework (NPPF).

**Highways / transport**
- Development of the site would have a very serious effect on traffic flow, particularly on Chapel Road, Normans Road, Scotts Hill, Rookery Hill and Dayseys Hill.
- Smallfield not served by train line and bus service is limited and dwindling. Reliance on car usage is a necessity for most residents. Unless these issues are resolved, most of these sites for consideration will have to include car usage.

**Landscape / Character**
- Development of the site would have a significant detrimental effect on the character of the area.

**Flooding**
- Area prone to surface water flooding.
- Parts of Smallfield are on a flood plain.

**Comments from the Environment Agency**
- Smallfield was subject to significant flooding during December 2013 and January 2014. Investigations concluded that the source of the flooding was from various sources including surface water and foul water.
- The lead Local Flood Authority, Surrey County Council, have progressed with a detailed investigation to commence a Flood Alleviation Scheme. This study has produced an Initial Assessment that highlights potential options and recommendations that can be taken forward.
- Recommend that no sites in Smallfield should be taken forward for future housing allocations until the results of the flood alleviation scheme are agreed. The majority of these sites identified should be safeguarded as areas for any potential flood alleviation scheme; be it flood storage or new channels.
- The Council has recently recognised the requirement for a Flood Alleviation Scheme in Smallfield by allocating future Community Infrastructure Levy (CIL) funds to this project over the next three years.
- It is anticipated that a preferred option and business case for the scheme will be completed by 2018 and that any construction would proceed in 2019/20.
- The exact funding arrangements for any Flood Alleviation Scheme remain unclear and as a consequence there may still be some need for third party contributions. In this case there may be some potential for these development sites to be considered if they can offer some possible contribution to any wider flood scheme. However it will be impossible to assess the precise details until further evidence has been
produced to confirm the technical and economic possibility for any scheme.

**Rebuttal from Developer / Planning agent**

- The site is approximately 15 hectares in size and could accommodate around 400 – 500 houses with associated uses.
- The estimated yield was 370 dwellings taking account of a buffer to electricity pylons crossing the site, although the electricity lines can probably be put underground, allowing for a higher yield.
- It is well related to the settlement of Smallfield and adjoins the settlement boundary on its southern and south-western boundaries with frontage development along the other side of Chapel Road extending northwards for almost the full length of the eastern site boundary.
- It has good access links to the village centre and an extensive frontage to Chapel Road where RPS Highway Consultants have established that two access points can be readily accommodated and with a bus stop on Chapel Road.
- The site is generally unconstrained being in Flood Zone 1 and comprising a single parcel of Grade 3B agricultural land with no ponds, woodland or important trees or hedgerows within the main body of the site.
- A Landscape Assessment of the site has been commissioned and this concludes that it should properly be assessed as having a medium/high capacity to accommodate development. The site is generally unconstrained and a re-working of the Sustainability Assessment demonstrates that it is one of the most sustainable development sites on the edge of Smallfield.
- Consider that the site should be re-categorised to ‘Amber’, so that it can be further considered in the next stages of the Local Plan process.
- Smallfield is a key settlement for the delivery of new housing. It is classified as a semi-rural service centre but in terms of landscape/environmental sensitivity and contribution to the purposes of the Green Belt it is potentially more suited to expansion than the higher order urban settlements.
- It is well located to serve the Gatwick employment hub and enjoys a good range of existing facilities. Additional facilities, such as a new secondary school, can be provided in the context of a larger development package, but would not be viable if smaller numbers are proposed. There is therefore an argument for a sizeable number of new dwellings being directed to Smallfield.
- The release of land from the Green Belt at Smallfield to meet objectively assessed housing need is a decision that would involve the least degree of impact upon the purposes and objectives of Green Belt policy across the District.
- The site lies in Flood Zone 1, outside the flood plain that extends through the centre of Smallfield. In this respect the site has an advantage over the other Smallfield sites, many of which are affected by flooding to a greater or lesser degree.
- Sustainability Appraisal: A review has been undertaken of the Sustainability Appraisal produced by Lepus Consulting on behalf of the Council. The review has applied their own scoring method to the SA impacts. Consider adjustments need to be made to some of the scoring criteria for a range of sites. The review concludes that the site ranks highly against other sites around Smallfield including some of those categorised as ‘Amber’.

**Council’s response**

Since the conclusion of the Local Plan: Sites Consultation at the end of 2016, the Council has adopted a preferred strategy against which the Local Plan is being prepared. Smallfield is identified as a Tier 2 settlement (Semi-Rural Service Centre) in the Council’s Settlement Hierarchy (2015). The Preferred Strategy for the Local Plan aims to meet development needs through delivery of sustainable development on sites within and on the edge of Tier 1 and 2 settlements, where exceptional circumstances exist that justify altering the Green Belt boundary.

SMA 013 is a category 3 site – Sites outside areas for further investigation. The site had been ruled out from further consideration due to landscape evidence. However, evidence has been submitted during this consultation that needs to be considered in more detail.

The National Planning Policy Framework allows the boundary of a Green Belt to be moved in exceptional circumstances through a Local Plan. The Green Belt boundary is not an absolute and as a policy intervention it can move, expand and shrink within the existing policy framework. The impacts of delivering built development will always need to be balanced in the Plan against the positive contribution to be made, whether the land is located in the Green Belt or not. The Green Belt boundary would only be amended in locations where exceptional circumstances exist that justify altering the boundary.

The Council acknowledges that infrastructure is a concern for a number of interested parties. It will be through continued engagement with service providers that these matters will be considered. The final Local Plan will be accompanied by an Infrastructure Delivery Plan which will set out the infrastructure needed and potential sources of funding.

The Council acknowledges that flood risk and utility provision is a concern for a number of interested parties. It will be through continued engagement with infrastructure providers, including utility companies, Surrey County Council as the Lead Flood Authority
and the Environment Agency, that these matters will be considered. Following the adoption of the Council’s Preferred Strategy for the Local Plan, the Council will carry out more detailed work to further inform the preparation of the Local Plan. Consideration of evidence from the Strategic Flood Risk Assessment will assist in this process.

The Council notes all other comments made. This information could be useful for informing further iterations of the Council’s evidence base.

| **Action** | The Council will prepare the Local Plan on reflection of all evidence based documents and carry out exceptional circumstances tests as appropriate prior to determining final site allocations. |
Appendix 3

TDS Initial Drainage Analysis and Strategy (dated 22/11/17)
Rydon Homes

Site Reference SMA 013

Land at Chapel Road, Smallfield

Initial Drainage Analysis and Strategy

1. Introduction

Rydon Homes are currently promoting a parcel of land known as SMA013 in the Tandridge District Council Plan Review. The parcel is on the west side of Chapel Road and is bounded on the south side by the houses on the north site of Carey’s Wood and the north side by existing properties fronting onto Chapel Road.

TDS Southern Ltd have been asked by Rydon Homes to investigate the existing drainage in Smallfield and the immediately surrounding area, to determine the impact which potential development will have on the surface water regime in the future, given that Smallfield and the surrounding areas of Burstow and Outwood have a history of flooding. TDSS have also been asked to comment on foul drainage in the area.

2. The Site

The site is currently a green field with no obvious crops and covered with short green grass. It is on the northern extremity of the village of Smallfield, with the residential road of Carey’s Wood to the south, Chapel Road to the east and a Bridleway to the west. The north of the site has individual properties on the boundary, to which access is gained from Rookery Lane to the north. The land is generally flat, with a slight slope downwards towards the south and virtually level from west to east. There is a strip of land between the field boundary and Chapel Road which varies in width but is approximately 10metres wide. This strip is open to the road on the east side and has a hedge and ditch to the west. The field is approximately half a metre higher than this strip, which also contains modern shallow drainage ditches running away from Chapel Road into the field ditch. Some of these ditches have been formed with concrete channel units, presumably to improve surface water runoff into the field ditch.

3. Flooding.

3.1. Background

3.1.1. The Tandridge District Council area, of which Smallfield forms a small part, has suffered several flooding incidents in recent years, and the worst event occurred in the winter of 2013/14. This led to a district wide investigation and the issuing of a Section 19 Flood Report dated 28th October 2015.

3.1.2. The plan below indicates the principle areas which suffered the worst flooding. It can be clearly seen that Smallfield and Burstow suffered flooding over a significant area.

3.1.3. The report identifies that the flooding occurred mainly as a result of a period of frequent heavy rainfall, which led to saturation of the ground in those areas. In addition, the soils in the area, particularly in a westerly direction from the centre of
Smallfield are part of the Weald Clay Formation, which is a mudstone and highly impermeable. To the east of Smallfield centre, the soils are superficial River Terrace Deposits around the Burstow Stream, which also have the potential to allow surface flooding.

3.1.4. Environment Agency Flood Maps

Flood maps are published by the Environment Agency to indicate areas which are at risk of flooding during a number different storm intensities.

This plan shows that the flooding in Smallfield is part of a much larger area at risk of flooding. In fact, this is the eastern extremity of the Upper River Mole Catchment.
which flows west and north, eventually discharging into the River Thames. A closer view of the area shows that the site is outside of the area at risk of flooding, which generally follows along Weatherhill Road in a westerly direction.

3.2. Analysis

3.2.1. A desk top review of the documents, together with a site visit and walkover on 15th November 2017 has resulted in a number of observations

3.2.2. Site Observations

3.2.2.1. The site is currently undeveloped and comprises short grassland. It slopes gently to the south and has little slope to either west or east. Ground levels within the site are approximately 0.5 metres above Chapel Road.

3.2.2.2. There is a field ditch running from north to south on the eastern edge of the site and on the east side of a hedge. Although this ditch has been used to drain surface water from Chapel Road, it is also likely that it drains ground water from the eastern part of the site. It is unclear whether the strip of land between the hedge surrounding the site and Chapel Road is within the site’s ownership, or is part of the public highway, but it is highly likely that riparian rights of drainage exist for part of the site into the ditch. At the time of the site visit, the ditch was fairly overgrown but appeared to be almost completely dry for most of its length, even though an average amount of rainfall had fallen in the previous months.

3.2.2.3. A further ditch was observed on the south side of Rookery Lane, to the north of the site. This ditch was flowing westwards, appeared to be well maintained by the properties through which it flowed and was flowing at about 5-10% of its capacity. This ditch was observed to join another ditch approximately 100 metres along Rookery Lane to the west, which was flowing due south under Rookery Lane. Although it was not possible to follow the combined ditches, plans of the area show that this ditch flows south to the north-
western corner of the site, turning to flow in a south-westerly direction, following the site boundary to the point where it meets the bridleway on the west side of the site. The ditch then continues to flow in a roughly western direction then southerly direction again until it reaches Weatherhill Road at its junction with Hathersham Close and Broadbridge Lane. Despite a close inspection of this area, no evidence could be found to locate this ditch. It must, therefore, be concluded that it has been piped and buried.

3.2.2.4. The ditch on the eastern side of the site continues south and becomes a well maintained ditch in front of Foxwood Cottage and 2, Careys Copse, before disappearing underground at Carey’s Wood. It must be assumed that the piped ditch continues south to Weatherhill Road.

3.2.2.5. Although access could not be gained to the site, it is likely that there is a field drain running west along the southern boundary of the site. There was evidence of a ditch in this location, observed in the south-east corner of the site, although it was very overgrown.

3.2.2.6. The bridleway on the western side of the site was also investigated and a ditch was located on each side of the track. The one on the western side was deeper and wider, although obstructed by a number of obstacles, branches and domestic rubbish, etc. The eastern side ditch was very shallow and little more than a depression.

3.2.3. Desk top Analysis

3.2.3.1. The Section 19 Report into the 2013/14 floods suggests that the worst flooding occurred on the south side of Weatherhill Road in the area between Broadbridge Lane, Woodside Crescent and Wheelers Lane. It is also apparent from various documents that Weatherhill Stream follows the route of Weatherhill Road and has been converted into a 1.8metre by 1metre wide culvert. Weatherhill Stream is the upper part of the Burstow Stream Catchment, which in turn is part of the River Mole. Clearly, this network flows west and north, from Smallfield, under the M23 an up to the River Thames.

3.2.3.2. Reference to the Environment Agency Flood Maps confirms this assumption which clearly indicate the flood risk areas following the Weatherhill Stream to the River Mole and eventually to the River Thames.

3.2.3.3. Flows from the subject site, as observed from the site visit, appear to flow generally south and west, although a small strip on the eastern boundary would appear to flow south into the upper end of the Weatherhill Road culvert

3.2.3.4. The subject site seems to be quite well served with riparian ditches around the boundaries and this is supported by observations on site that there was no evidence of ponding or marshy land. Therefore, it is reasonable to assume, given the impermeable nature of the subsoil, that the accepted figure of 5 litres per second per hectare for surface water runoff from a greenfield site would be a suitable figure for this site.

3.2.3.5. It was also ascertained that there is a proposal for a Smallfield Flood Alleviation Scheme in place. This was included in a report to Surrey County Council published in August 2017 in response to the S19 Report of 2015. It concluded that maintenance of the system would be beneficial, but it would not be sufficient to solve the flooding problems. An Initial Assessment has been carried out and further investigations are underway. £300k has been secured from Tandridge District Council via CIL funding for works required. However, the
proposals for the Flood Alleviation Scheme have not yet been concluded, so it is not yet known whether this will be sufficient to fund the whole scheme.

3.3. Future Proposals

3.3.1. The current proposal for SMA013 is for a residential development of circa 400 dwellings and is under consideration by Tandridge District Council, along with a number of other sites in Smallfield, as part of its preparation of a new Local Plan for the period 2013 to 2033.

3.3.2. Burstow Parish Council have also commenced preparation of the Burstow and Smallfield Neighbourhood Plan and have embarked on a number of private meetings with interested parties who are promoting potential housing sites.

3.3.3. SMA013 is well placed from a drainage perspective since it is outside the Environment Agency’s Flood Zones and it is also beyond the areas identified as having flooded in the 2013/14 floods.

3.3.4. Most of the other sites which are currently under consideration in the Smallfield area are at least partly within the flood zones shown on the EA maps.

3.3.5. Tandridge District Council is under considerable pressure from central government to allocate new sites for development, in order to meet future targets for housing. This need will be reinforced by several articles in the press recently concerning the shortage of housing across the whole of the UK but particularly in the south-east and calls for the Chancellor to allocate funds for housing in the Budget.

3.3.6. SMA013 has further benefits as a development site since careful design of levels within the site could ensure that all runoff from the site will be routed in a south-westerly direction, thereby avoiding the principal areas which have suffered flooding in the past.

3.3.7. This design principle would also take any existing flows from the site which currently discharge into the Weatherhill Stream at its junction with Chapel Road and redirect them further westwards, thereby reducing the flows in the Weatherhill Stream and contributing to a reduction in flows at a critical point in the centre of Smallfield.

3.3.8. A carefully designed scheme for surface water drainage would restrict all runoff from the site to the greenfield discharge figure of 5 litres per second per hectare, or less if designed with flood mitigation in mind.

3.3.9. The Smallfield Flood Alleviation Scheme, when implemented, will also serve to alleviate the current risk of flooding and, although currently benefitting from £300k of CIL funding, further development may increase the opportunities to further fund the improvements through use of enhanced CIL contributions from the new development.

4. Foul Water

4.1. The brief for this report also included foul drainage, although it is acknowledged that this is not the main focus. However, the S19 Report did draw attention to the fact that some of the 2013/14 flooding did include foul sewage, due to the fact that there are several storm water overflows in the area, which allow storm water to occasionally overflow into the foul system at times of high rainfall.

4.2. The Smallfield Flood Alleviation Scheme will, hopefully, address this issue but changes to the Water Industry Act will result in the introduction in April 2018 of a new charge payable for each new property built which will be used to upgrade and enhance the system to be able to cope with new development.
4.3. This charge is similar to the current Infrastructure Charges which are currently charged for both water and sewer connections to new properties but were only intended for network reinforcement as a result of each particular development. The new charge will place the responsibility for providing a network which is “fit for purpose” totally on the Water Authorities. The new charge will provide the funding for this and, from 1st April 2018, the Water Authorities will be responsible for ensuring that their network is capable for dealing with flows from new developments.

4.4. It is envisaged that this new charge will address the issues such as those encountered in Smallfield, where flooding issues are exacerbated by storm water overflowing into foul networks and causing foul water flooding.

5. Recommendations

5.1. This report is intended to provide an initial analysis of the current situation in Smallfield of recent flooding events in particular relation to the parcel of land adjacent to Chapel Road known as SMA013.

5.2. Further investigations will be required in due course to identify the flow routes in more detail, and to put together a more detailed strategy for draining the site in the event that it achieves allocation in the Tandridge Local Plan for residential development.

6. Conclusions

6.1. This report has identified, by visual site inspection, and by desk top study, that site SMA013 from a drainage perspective is well placed to be considered for allocation in the emerging Local Plan and the Burstow and Smallfield Neighbourhood Plan.

6.2. The existing drainage has been observed and analysed and it is concluded that the site is not identified as being at risk of flooding.

6.3. Whilst the natural path for surface water is in a southerly direction, most of the flow finds its way towards the south-west corner of the site, although a proportion also flows south along Chapel Road to the Weatherhill Stream, which is a culverted Main River.

6.4. As a result, the site has not materially contributed to the flooding problems in Smallfield in the past.

6.5. Future development, if permitted, would ensure that, by careful design, runoff from the site would be limited to, or reduced from, the current greenfield runoff rate and that the outfall from the site would carry flood water away from the centre of the village to a point where it joins the catchment further downstream.

6.6. Changes in the Water Industry Act in April 2018, particularly in relation to foul sewers, should also mean that the Water Authority will be responsible that foul water flooding does not occur in Smallfield.

6.7. No doubt, this will feed into the Smallfield Flood Alleviation Scheme, which is currently in the investigation phase.

David Antill, C.Eng., MICE, B.Sc(C.Eng)
TDS (Southern) Ltd.
November 2017.
Appendix 4

TDS SFRA Report for Regulation19 consultation (dated 28/08/2018)
1. Introduction
Rydon Homes are currently promoting a parcel of land known as SMA013 in the Tandridge District Council Plan Review. The parcel is on the west side of Chapel Road to the north of the centre of Smallfield. The Draft Local Plan has now been published for consultation but does not include Site SMA 013

TDS Southern Ltd have been commissioned by Rydon Homes to provide support on drainage matters and provided an Initial Drainage Analysis and Strategy in November 2017. The purpose of this report is to review the relevant parts of the Draft Local Plan and associated documents and provide a supporting report to assist in the response to the Council.

2. The Site
The site is currently a green field situated on the northern extremity of the village of Smallfield, with Carey’s Wood to the south, Chapel Road to the east and a Bridleway to the west. The north of the site has individual properties on the boundary, to which access is gained from Rookery Lane to the north. The land has a slight slope upwards from south to north and is virtually level from west to east. The site is approximately half a metre higher than the road, with a drainage ditch between, and a stream just beyond the north-western boundary.

3. Draft Local Plan
The Draft Local Plan was published in July 2018 for consultation with interested parties and includes the Council’s proposals for achieving the desired level of housing development for the next 15 years. The proposal divides the Council’s area into separate Tiers, Smallfield being in Tier 2, Semi Rural Settlements. The allocation of new housing in Tier 2 across the Borough is 533 units of mixed type and tenure.

Section 22 sets out how the allocation will be made up in various locations and lists four sites in Smallfield, with a total of 305 units proposed. Those sites, identified as Policy References HSG01, HSG02, HSG03 and HSG04 are shown outlined on an Environment Agency Flood Map at Appendix 1. Site SMA 013 is also shown outlined in purple.

In order to obtain further information, Tandridge District Council commissioned a Level 2 Strategic Flood risk Assessment to review various sites being considered for inclusion in the Draft Local Plan.

4.1. Background

4.1.1. Smallfield has suffered several flooding incidents in recent years, and the worst event occurred in the winter of 2013/14.

4.1.2. The Level 2 SFRA carried out Risk Assessments for 6 sites in Smallfield but did not include SMA 013.

4.1.3. This report uses the information provided in the SFRA and combined it with other information, for example the Environment Agency’s Flood maps, to provide a comparable Risk Assessment for the West of Chapel Road Site (SMA 013).

4.2. Proposed Sites HSG01 – HSG04

4.2.1. As is clearly shown on the EA map in Appendix 1, each of the proposed sites is significantly closer to the area of historic flooding than SMA 013.

4.2.2. HSG02 and HSG04 are located at the lowest part of the village and are very likely to suffer severe flooding if further flood events occur. In excess of 50% of HSG02 is in Flood Zone 3 and HSG04 is completely surrounded by both Flood Zone 2 and Flood Zone 3.

4.2.3. HSG01 and HSG03 are slightly more remote from the area affected by flooding but are located to the south and east of the low-lying area in the centre of Smallfield. As a result, there is a high likelihood that surface water drainage from these sites will have to discharge into Weatherhill Stream, the culvert which flows westward under Weatherhill Road and which is the main outfall for the village. This means that runoff from them will continue to contribute to flooding risks in the future.

4.2.4. SMA 013 has a significant advantage due to its location. It is located away from the centre of Smallfield, so has not suffered flooding in the past. It has a natural slope from north to south, is generally set slightly higher than surrounding land, and has riparian ditches on 3 sides. This means that the existing greenfield runoff from the site almost certainly finds its way into the Weatherhill Stream. An opportunity exists to design the drainage from the site to ensure that the outfall leaves the site in the south west corner, thereby entering the Weatherhill Stream to the west of the area where the flooding occurred in 2013/14. There is an existing ditch in this area alongside the Bridleway and with some clearing and regulating works, could serve as the outfall from the site, subject to the necessary approvals.

4.2.5. SMA 013 is mainly clear of any physical constraints and therefore is highly suitable for an advanced SuDS scheme which could not only attenuate flows to significantly less than the current greenfield flow, but also offer opportunities for filtering and cleaning to promote biodiversity and ecological habitats.

4.2.6. Environment Agency Flood Maps

Flood maps are published by the Environment Agency to indicate areas which are at risk of flooding during a number of different storm intensities.
This map indicates in dark blue the areas likely to be affected by 1 in 30 year storm events, medium blue is for storms between 1 in 30 and 1 in 100 years, pale blue covers storms between 1 in 100 and 1 in 1000 years, and white shows possible flooding for storms in excess of 1 in 1000 years.

As can be seen, the Land West of Chapel Road is almost entirely in the white area, the only exception being a very narrow strip on the north-western boundary which may be affected by storms in the 1 in 100 to 1 in 1000 year range.

5. Detailed Site Summary Tables

5.1. Following the same format as those provided in the Level 2 SFRA, a Risk Assessment has been carried out for SMA 013, using information obtained from site observations, the Draft Local Plan and the SFRA. It clearly shows that, from a flood risk perspective, SMA 013 offers advantages over all of the sites being proposed in the Draft Local Plan. The Detailed Site Summary Table for site SMA 013 is included at Appendix 2.

6. Conclusions

6.1. The Land West of Chapel Road, Smallfield, has not been included in the Draft Local Plan currently published for consultation. This report seeks to put forward analysis and support for Rydon Homes’ submission that SMA 013 should be included.
6.2. The 4 sites currently being proposed are either in Flood Risk Zones 2 and 3, or are very close to them. All would have to drain into the Weatherhill Stream and could potentially exacerbate current flooding problems.

6.3. SMA 013 is further away from the epicentre of flooding, is elevated, and has a potential solution which would significantly contribute to flood reduction measures for the centre of Smallfield.

6.4. It is recommended that the site be included in the Draft Local Plan, so that further investigations can be carried out to determine the most effective way of designing the surface water drainage such that some of the flooding can be alleviated in future.

6.5. It is understood that the site could yield up to 370 new homes. Negotiations could be instigated to agree contributions to further alleviate flooding issues further downstream.

David Antill, C.Eng., MICE, B.Sc(C.Eng)
TDS (Southern) Ltd.
September 2018.
Appendix 1

Environment Agency Flood Map and Site Locations
Flood map for planning

Your reference Location (easting/northing) Created
EA Flood Map 531683/143757 28 Aug 2018 4:26

Your selected location is in flood zone 1, an area with a low probability of flooding.

This means:

• you don’t need to do a flood risk assessment if your development is smaller than 1 hectare and not affected by other sources of flooding

• you may need to do a flood risk assessment if your development is larger than 1 hectare or affected by other sources of flooding or in an area with critical drainage problems

Notes

The flood map for planning shows river and sea flooding data only. It doesn’t include other sources of flooding. It is for use in development planning and flood risk assessments.

This information relates to the selected location and is not specific to any property within it. The map is updated regularly and is correct at the time of printing.

Selected point SMA013

Flood zone 3
Flood zone 3: areas benefiting from flood defences

Flood zone 2

Flood zone 1

Flood defence

Main river

Flood storage area

EA Flood Map
531683/143757
1:10000
28 Aug 2018 4:26

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Appendix 2

Detailed Site Summary Tables for Site SMA 013
## Site Summary Tables

<table>
<thead>
<tr>
<th>Site Code</th>
<th>SMA 013</th>
</tr>
</thead>
<tbody>
<tr>
<td>Site Name</td>
<td>Land West of Chapel Road, Smallfield</td>
</tr>
</tbody>
</table>

### Site details

<table>
<thead>
<tr>
<th>OS Grid Reference</th>
<th>531683 143757</th>
</tr>
</thead>
<tbody>
<tr>
<td>Area</td>
<td>14.9ha</td>
</tr>
<tr>
<td>Current Land Use</td>
<td>Greenfield</td>
</tr>
<tr>
<td>Proposed Site Use</td>
<td>Housing</td>
</tr>
<tr>
<td>Flood Risk Vulnerability</td>
<td>More Vulnerable</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Existing Watercourses</th>
<th>Watercourse adjacent to north west boundary</th>
</tr>
</thead>
<tbody>
<tr>
<td>Flood history</td>
<td>No recorded flood history within site boundary. EA flood maps show minor encroachment on north west boundary</td>
</tr>
</tbody>
</table>

#### Proportion of site at risk in Flood Zones

<table>
<thead>
<tr>
<th>Flood Zone</th>
<th>FZ3b</th>
<th>FZ3a</th>
<th>FZ2</th>
<th>FZ1</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>0%</td>
<td>0%</td>
<td>0%</td>
<td>100%</td>
</tr>
</tbody>
</table>

**Flood Characteristics:** Site is entirely within Flood Zone 1

#### Proportion of site at risk (RoFSW)

<table>
<thead>
<tr>
<th>Recurrence</th>
<th>30 year</th>
<th>100 year</th>
<th>1000 year</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>0%</td>
<td>0%</td>
<td>1%</td>
</tr>
</tbody>
</table>

**Surface Water**

Surface water ponding may occur close to the stream on the north west boundary. There is a low risk that the stream will cause very minor flooding of a small area of the site in a 1 in 1000 year event. (source: EA flood maps)

#### Groundwater

**Area Susceptible to Groundwater Flooding (risk of groundwater emergence)**

- Negligible risk of groundwater flooding
- No risk of reservoir flooding
- No canal within 100m of the site
## Site Summary Tables

<table>
<thead>
<tr>
<th>Site Code</th>
<th>SMA 013</th>
</tr>
</thead>
<tbody>
<tr>
<td>Site Name</td>
<td>Land West of Chapel Road, Smallfield</td>
</tr>
</tbody>
</table>

### Flood Risk Management Infrastructure

<table>
<thead>
<tr>
<th>Flood Risk Management Infrastructure</th>
<th>Defences</th>
<th>Defence Type</th>
<th>Standard of Protection</th>
<th>Condition</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>This site does not receive protection from flood defences</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Residual Risk</td>
<td>Culvert/Structure Blockage?</td>
<td>There are no structures currently on site with potential to block</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Impounded Water Body Failure?</td>
<td>No risk from reservoir failure</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Defence breach/overtopping</td>
<td>Breach Zone</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

### Emergency Planning

<table>
<thead>
<tr>
<th>Emergency Planning</th>
<th>Flood Warning</th>
<th>Access and Egress</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>The site is not covered by any flood alert or warning areas</td>
<td>Access to the site is from Chapel Road towards the north end of the site. This is the high point of the site.</td>
</tr>
</tbody>
</table>

### Climate Change

<table>
<thead>
<tr>
<th>Climate Change allowance for '2080s'</th>
<th>River Basin District</th>
<th>Central</th>
<th>Higher Central</th>
<th>Upper End</th>
</tr>
</thead>
<tbody>
<tr>
<td>Thames</td>
<td>25%</td>
<td>35%</td>
<td>70%</td>
<td></td>
</tr>
</tbody>
</table>

### Implications for the site

Climate change is unlikely to affect the flood zone classification of the site.
<table>
<thead>
<tr>
<th>Requirement for Drainage Control and Impact Mitigation</th>
<th>Site Summary Tables</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Site Code</strong></td>
<td><strong>SMA 013</strong></td>
</tr>
<tr>
<td><strong>Site Name</strong></td>
<td><strong>Land West of Chapel Road, Smallfield</strong></td>
</tr>
<tr>
<td><strong>Bedrock Geology</strong></td>
<td>Wealden Formation - Mudstones, siltstone and sandstones.</td>
</tr>
<tr>
<td><strong>Superficial Geology</strong></td>
<td>No superficial deposits are known to exist, other than topsoil</td>
</tr>
<tr>
<td><strong>Soils</strong></td>
<td>well drained due to slope. No signs of surface water</td>
</tr>
<tr>
<td><strong>SuDS</strong></td>
<td>Due to the location of the site, it is likely that surface water accumulations from the site contribute to flooding issues in the centre of Smallfield. Therefore, runoff will be limited to existing greenfield rates. Development of this site would, however, provide an opportunity to positively affect future potential flooding by attenuation to less than greenfield rates, and also to direct flows to the south west, thereby reducing flows in the lowest parts of Smallfield. Infiltration techniques are unlikely to be effective, but opportunities will exist for biodiversity, recreation and education around SuDS features</td>
</tr>
<tr>
<td><strong>Groundwater Source Protection Zone</strong></td>
<td>The site is not located within a groundwater source protection zone.</td>
</tr>
<tr>
<td><strong>Historic Landfill Site</strong></td>
<td>The site is not within a designated landfill site</td>
</tr>
<tr>
<td><strong>Opportunities for Flood Risk Betterment</strong></td>
<td>Positive opportunities exist to assist in mitigation of existing flooding problems elsewhere in Smallfield by careful design of a SuDS system, as described above. This would also allow, through good design, for biodiversity, water quality improvement and education opportunities</td>
</tr>
</tbody>
</table>
### Recommendations for Requirements of Site-specific Flood Risk Assessment, including guidance for developers

A site specific Flood Risk Assessment should be carried out, which considers all sources of flooding. A surface Water Drainage Strategy should be developed which will concentrate, not only on a SuDS based solution for the site, but also to identify the best solution to reduce the surface water run-off from the site, together with a strategy to redirect flows away from the areas of Smallfield which have, in the past, suffered from flooding issues. A design incorporating a combination of underground storage and open pond features will also promote ecological benefits for wildlife, as well as improved biodiversity through natural cleansing, and possibilities for water resource education.
Appendix 5

RPS Highways Technical Note for Regulation19 consultation (30/08/2018)
1 This Technical Note has been prepared by RPS to provide a highways review of sites HSG01 and HSG03 which are identified as preferred options within Tandridge District Councils Draft Local Plan for Smallfield. This Technical Note considers the potential impact of these sites on Smallfield based on their location and potential access points together with how they conform to the requirements of NPPF.

2 This note also compares the potential impact of site SMA 013 with sites HSG01 and HSG03. Site SMA 013 which was identified within the HELAA (Housing and Economic Land Availability Assessment), is not currently included within the Draft Local Plan.

**HSG01 – Land at Plough Road and Redehall Road, Smallfield**

3 The preferred site allocation HSG01 is a green field site situated to the south of Plough Road and east of Redehall Road for circa 160 dwellings, the location is shown in Figure 01 below. Access to this site could be taken via Plough Road or via an existing property on Redehall Road included within the red line boundary.

**Figure 01 – Preferred site allocation HSG01**
The preferred site allocation HSG03 is also a Greenfield site situated to the east of Meadow View for circa 120 dwellings, the location is identified in Figure 02 below. Access to this land is likely to be taken from Meadow View.

Figure 02 – Preferred site allocation HSG03

Existing Highway Network

The existing highway network provides, in general terms, a route through Smallfield travelling north and south, together with a route travelling east and west. The east / west route connects to Horley to the west with the rail station at Horley.

To the east the routes connect to East Grinstead, and beyond. North of Smallfield the various routes connect to the A25, and to the south the B2037, the A264 and in turn to the M23 at junction 10.

Within Smallfield the main junction is that connecting the east / west routes with the north /south routes. This is the mini roundabout junction of Weatherhill Road / Chapel Road / Redehall Road. Whilst this junction offers some opportunity for improvements which could include the provision of remote controlled pedestrian crossing facilities, it is a location where existing congestion occurs.

To the south of this junction is the Redehall Road/ Plough Road/ Wheelers Road junction which is a staggered priority junction arrangement. Redehall Road, up to the junction with Bridgeham Way is a 20mph safety zone within which access to the school is taken via Wheelers Lane.
All roads within the village are of a reasonable standard in terms of the width of the road, with footways to one side of the road as a minimum. The roads are also street lit with a 30mph speed limit other than within the central 20mph area.

Traffic Generation

In order to assess the volume of traffic these sites are likely to generate, the TRICS database has been reviewed. TRICS is a database which holds hundreds of surveys that have been undertaken at various sites across the UK for various uses and is an industry standard tool used as part of traffic impact assessments to obtain Trip Rates for new development proposals. For these sites, surveys in the South East have been selected with a similar level of development and location to that proposed, a copy of the TRICS output is included in Appendix A and the resultant trips are identified in the tables below.

Table 1 – Site HSG01

<table>
<thead>
<tr>
<th>Peak</th>
<th>Arrivals</th>
<th>Departures</th>
<th>Two-way</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Trip Rate</td>
<td>No. Trips</td>
<td>Trip Rate</td>
</tr>
<tr>
<td>AM Peak</td>
<td>0.138</td>
<td>22</td>
<td>0.366</td>
</tr>
<tr>
<td>PM Peak</td>
<td>0.346</td>
<td>55</td>
<td>0.166</td>
</tr>
</tbody>
</table>

Table 2 – Site HSG03

<table>
<thead>
<tr>
<th>Peak</th>
<th>Arrivals</th>
<th>Departures</th>
<th>Two-way</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Trip Rate</td>
<td>No. Trips</td>
<td>Trip Rate</td>
</tr>
<tr>
<td>AM Peak</td>
<td>0.138</td>
<td>17</td>
<td>0.366</td>
</tr>
<tr>
<td>PM Peak</td>
<td>0.346</td>
<td>41</td>
<td>0.166</td>
</tr>
</tbody>
</table>

Table 3 – Site HSG01 + HSG03

<table>
<thead>
<tr>
<th>Peak</th>
<th>Arrivals</th>
<th>Departures</th>
<th>Two-way</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Trip Rate</td>
<td>No. Trips</td>
<td>Trip Rate</td>
</tr>
<tr>
<td>AM Peak</td>
<td>0.138</td>
<td>39</td>
<td>0.366</td>
</tr>
<tr>
<td>PM Peak</td>
<td>0.346</td>
<td>96</td>
<td>0.166</td>
</tr>
</tbody>
</table>

The above tables show that individually these sites are likely to generate between 60 and 80 trips two-way during the peak periods although cumulatively there will be around 140 additional two-way trips.

Traffic Distribution

In order to assess the routes that vehicles are likely to take from the development sites and in turn the junctions that they are likely to pass through within Smallfield, reference is made to the 2011 Census database which provides details of where people, that currently live in Smallfield, work. The table below identifies the primary locations and the percentage of people that work in these areas.
Table 4 – Existing Work Place Destinations (2011 Census)

<table>
<thead>
<tr>
<th>Location</th>
<th>Percentage</th>
</tr>
</thead>
<tbody>
<tr>
<td>Reigate and Banstead</td>
<td>30%</td>
</tr>
<tr>
<td>Crawley</td>
<td>20%</td>
</tr>
<tr>
<td>Tandridge</td>
<td>20%</td>
</tr>
<tr>
<td>Mid Sussex</td>
<td>5%</td>
</tr>
<tr>
<td>Mole Valley</td>
<td>4%</td>
</tr>
<tr>
<td>Croydon</td>
<td>2%</td>
</tr>
<tr>
<td>Sutton</td>
<td>2%</td>
</tr>
<tr>
<td>Horsham</td>
<td>2%</td>
</tr>
<tr>
<td>Rest of UK</td>
<td>15%</td>
</tr>
</tbody>
</table>

As can be seen 80% of residents work in areas outside the District and as such are likely to use their car as their primary mode of transport. Of those that work within the Tandridge District, this has been split down further into key destinations as shown in the table below.

Table 5 – Work Place destinations within the Tandridge District

<table>
<thead>
<tr>
<th>Tandridge</th>
<th>Percentage</th>
</tr>
</thead>
<tbody>
<tr>
<td>Smallfield, Burstow and Outwood</td>
<td>57%</td>
</tr>
<tr>
<td>Caterham</td>
<td>14%</td>
</tr>
<tr>
<td>Godstone</td>
<td>5%</td>
</tr>
<tr>
<td>Nutfield</td>
<td>4%</td>
</tr>
<tr>
<td>Felbridge</td>
<td>4%</td>
</tr>
<tr>
<td>Blindley Heath</td>
<td>3%</td>
</tr>
<tr>
<td>Oxted</td>
<td>2%</td>
</tr>
<tr>
<td>Bletchingley</td>
<td>2%</td>
</tr>
<tr>
<td>Rest of Tandridge</td>
<td>9%</td>
</tr>
</tbody>
</table>

Based on the above tables it is possible to determine the likely traffic movements that vehicles will take when travelling to/from the preferred allocated sites during the network peak periods. The two primary junctions within Smallfield are;

- Plough Road/ Wheelers Lane/Redehall Road
- Chapel Road/ Weatherhill Road
The table below identifies the cumulative traffic movements generated by these two sites through the above junctions based on the census distribution. The access for HSG01 is reviewed assuming access is taken off Redehall Road and off Plough Road.

<table>
<thead>
<tr>
<th>Junction</th>
<th>Predicted Development Traffic Impact (HSG01 &amp; HSG03)</th>
<th>AM Peak</th>
<th>PM Peak</th>
</tr>
</thead>
<tbody>
<tr>
<td>Plough Road/Wheelers Lane/Redehall Road</td>
<td></td>
<td>103</td>
<td>104</td>
</tr>
<tr>
<td>Chapel Road/Weatherhill Road/Redehall Road</td>
<td></td>
<td>67</td>
<td>69</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Junction</th>
<th>Predicted Development Traffic Impact (HSG01 &amp; HSG03)</th>
<th>AM Peak</th>
<th>PM Peak</th>
</tr>
</thead>
<tbody>
<tr>
<td>Plough Road/Wheelers Lane/Redehall Road</td>
<td></td>
<td>117</td>
<td>119</td>
</tr>
<tr>
<td>Chapel Road/Weatherhill Road/Redehall Road</td>
<td></td>
<td>67</td>
<td>69</td>
</tr>
</tbody>
</table>

As can be seen, depending upon the access location for HSG01 the impact on these junctions will vary although in either case there will be in excess of 100 two-way vehicles travelling through the Plough Road/Wheelers Lane/Redehall Road junction and around 70 two-way additional vehicle movements at the Chapel Road/Weatherhill Road junction.

Traffic Impact

Based on Google Maps Traffic plots, the peak weekday periods show slow moving traffic on the approaches to both of the above junctions in the AM and PM Peak periods with queues extending south along Redehall Road and along Plough Road although there are fewer queues on Chapel Road and Weatherhill Road. Both of these junctions are identified within the Draft Local Plan as being a concern stating that developers would need to ‘explore opportunities for junction improvements’.

The impact will be greatest on the Plough Road/Redehall Road/Wheelers Road junction which is currently a staggered crossroad arrangement. However, the existing layout and limited highway land available at this junction limits the level of improvement that can be achieved and it is considered that the existing constraints would limit the ability for these sites to mitigate their cumulative impact.

The Chapel Road/Weatherhill Road junction is a mini roundabout arrangement with a priority junction arrangement immediately to the south of this junction which causes added confusion within this area and is likely to add further delay. This junction appears to have some highway land available to the north-western side of the junction, although this is limited and it is considered that only small
improvements in terms of capacity are likely to be achieved at this location. The Figure below is an extract from Google Maps showing the typical slow moving traffic within Smallfield during the PM Peak Period.

Figure 03 – Extract from Google Maps – Typical Traffic – PM Peak

The above shows that these junctions are currently experiencing long delays during the peak periods and will be severely impacted upon should developments on sites HSG01 and HSG03 be brought forward. Based on the level of traffic predicted to travel through these junctions, in particular the Redehall Road/ Wheelers Lane/ Plough Road junction it is considered that these developments in their location will have a severe impact on this part of the highway network in terms of capacity and highway safety. This is contrary to the recommended guidance within NPPF which states in para 109 ‘Development should only be prevented or refused on highway grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.’

There is no evidence to suggest that there are mitigation measures available to address this impact on the local highway network associated with the levels of development proposed as part of HSG01 and HSG03.

HELAA Site Reference SMA 013

Within the HELAA, site SMA 013 to the north of Smallfield was included as a potential development site. This site is situated to the west of Chapel Road and bounds existing residential development to the south. The maximum potential yield of this site could be circa 370 dwellings although the actual development may be less due to physical, environmental or policy constraints. This site was confirmed within the HELAA as being in accordance with the ‘Preferred Strategy’ and therefore in an acceptable location for development. The site location is provided in Figure04 below.
Using the same trip rates used for the HSG01 & HSG03 sites, the traffic movements likely to be generated by this site, assuming a development scheme of circa 300 dwellings, are identified in the table below.

### Table 8 – Site SMA 013

<table>
<thead>
<tr>
<th>Peak</th>
<th>Arrivals</th>
<th></th>
<th>Departures</th>
<th></th>
<th>Two-way</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Trip Rate</td>
<td>No. Trips</td>
<td>Trip Rate</td>
<td>No. Trips</td>
<td>Trip Rate</td>
<td>No. Trips</td>
</tr>
<tr>
<td>AM Peak</td>
<td>0.138</td>
<td>41</td>
<td>0.366</td>
<td>110</td>
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<td>151</td>
</tr>
<tr>
<td>PM Peak</td>
<td>0.346</td>
<td>104</td>
<td>0.166</td>
<td>50</td>
<td>0.512</td>
<td>154</td>
</tr>
</tbody>
</table>

Based on the same work place destinations identified in Tables 4 & 5, the traffic movements through the two key junctions within Smallfield are identified in the table below.

### Table 9 – Predicted traffic increase – SMA 013 access off Chapel Road

<table>
<thead>
<tr>
<th>Junction</th>
<th>Predicted Development Traffic Impact (SMA 013)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>AM Peak</td>
</tr>
<tr>
<td>Plough Road/ Wheelers Lane/ Redehall Road</td>
<td>41</td>
</tr>
<tr>
<td>Chapel Road/ Weatherhill Road/ Redehall Road</td>
<td>66</td>
</tr>
</tbody>
</table>
Table 9 above shows that whilst the level of development on land at SMA 013 is greater than both the preferred site allocations, the impact will be 65% less at the Plough Road/ Wheelers Lane/ Rede hall Road junction. At the Chapel Road/ Weatherhill Road junction the through traffic movements are broadly the same as the HSG01 & HSG03 sites however the direction of travel is different. With the HSG sites, 52% of development traffic will travel along Rede hall Road whereas with the SMA site only 27% of traffic will travel along Rede hall Road.

On the basis of the above it is considered that the site allocation at SMA 013 would prove to have a much lesser impact on the existing junctions within Smallfield and as such it is considered that the level of mitigation that could be achieved at these junctions would be sufficient to mitigate this level of impact.

Notwithstanding the above, should the preference be to see a greater level of development within Smallfield which would include all sites identified in this Technical Note, there would be greater opportunities for more significant improvements to be provided within Smallfield which would normally be unrealistic in terms of viability for smaller levels of development to deliver. This would not only include highway improvements, but also improvements for pedestrians, cyclists and public transport which could be delivered by all development sites collectively.

**Conclusion**

The assessment for site allocations within the HELAA included a total of 16 sites within Smallfield, of these 16, 6 have been identified as preferred locations within the Draft Local Plan. This Technical Note reviews the potential impact of HSG01 and HSG03 which account for 4 of the sites within the HELAA. The level of traffic likely to be generated by these two sites cumulatively will be in the region of 140 two-way additional traffic movements, of which around 83% of movements will go through the Plough Road/ Wheelers Lane/ Rede hall Road junction which is currently operating above its design capacity with long delays experienced during the PM Peaks.

The Plough Road/ Wheelers Lane/ Rede hall Road junction is currently constrained in terms layout and the amount of available highway land limiting the level of improvements that can be undertaken and as such it is considered that it is unlikely that the impact of these two sites can be suitably mitigated.

On this basis it is considered that the impact of the preferred sites identified in the draft local plan will have a severe impact on the local highway network in terms of capacity and highway safety due to their location within Smallfield and as such will not be accordance with the policies set out in the NPPF.

Site SMA 013 identified in the HELAA was accepted as conforming to the relevant strategy policies and has a maximum site yield of circa 370 dwellings. The location of this site is to the north side of Smallfield and as such the impact of a potential scheme of circa 300 dwellings on the junctions within Smallfield during the peak periods will be significantly less with around 65% fewer vehicles travelling through the Plough Road/ Wheelers Lane/ Rede hall Road junction when compared to the preferred site allocations. This lower volume of traffic will have a lesser impact on the junctions within Smallfield and therefore the level of improvements that can be provided to these junctions is more likely to provide suitable mitigation ensuring that highway safety and capacity is not adversely affected, and in turn conforms to the policies set out in NPPF.

Notwithstanding the above, should a greater level of development be allocated within Smallfield including site SMA 013, this would bring forward opportunities for more significant improvements to be provided which would be viable for all development sites collectively but not viable for smaller development sites to deliver. This would not only include more significant highway improvements but also improvements to pedestrian/cycle and PT accessibility.
TRIP RATE CALCULATION SELECTION PARAMETERS:

Land Use : 03 - RESIDENTIAL
Category : A - HOUSES PRIVATELY OWNED

VEHICLES

Selected regions and areas:
02 SOUTH EAST
  ES EAST SUSSEX  2 days
  KC KENT  3 days
  WS WEST SUSSEX  2 days

This section displays the number of survey days per TRICS® sub-region in the selected set

Secondary Filtering selection:

This data displays the chosen trip rate parameter and its selected range. Only sites that fall within the parameter range are included in the trip rate calculation.

Parameter: Number of dwellings
Actual Range: 110 to 363 (units: )
Range Selected by User: 100 to 500 (units: )

Public Transport Provision:
Selection by: Include all surveys

Date Range: 01/01/10 to 19/04/18

This data displays the range of survey dates selected. Only surveys that were conducted within this date range are included in the trip rate calculation.

Selected survey days:
Monday 1 days
Wednesday 2 days
Thursday 2 days
Friday 2 days

This data displays the number of selected surveys by day of the week.

Selected survey types:
Manual count 7 days
Directional ATC Count 0 days

This data displays the number of manual classified surveys and the number of unclassified ATC surveys, the total adding up to the overall number of surveys in the selected set. Manual surveys are undertaken using staff, whilst ATC surveys are undertaking using machines.

Selected Locations:
Suburban Area (PPS6 Out of Centre) 1
Edge of Town 6

This data displays the number of surveys per main location category within the selected set. The main location categories consist of Free Standing, Edge of Town, Suburban Area, Neighbourhood Centre, Edge of Town Centre, Town Centre and Not Known.

Selected Location Sub Categories:
Residential Zone 7

This data displays the number of surveys per location sub-category within the selected set. The location sub-categories consist of Commercial Zone, Industrial Zone, Development Zone, Residential Zone, Retail Zone, Built-Up Zone, Village, Out of Town, High Street and No Sub Category.

Secondary Filtering selection:

Use Class:
C3 7 days

This data displays the number of surveys per Use Class classification within the selected set. The Use Classes Order 2005 has been used for this purpose, which can be found within the Library module of TRICS®.
Secondary Filtering selection (Cont.):

Population within 1 mile:
1,000 or Less 1 days
5,001 to 10,000 1 days
10,001 to 15,000 3 days
15,001 to 20,000 1 days
20,001 to 25,000 1 days

This data displays the number of selected surveys within stated 1-mile radii of population.

Population within 5 miles:
5,001 to 25,000 1 days
50,001 to 75,000 2 days
75,001 to 100,000 1 days
125,001 to 250,000 3 days

This data displays the number of selected surveys within stated 5-mile radii of population.

Car ownership within 5 miles:
0.6 to 1.0 1 days
1.1 to 1.5 6 days

This data displays the number of selected surveys within stated ranges of average cars owned per residential dwelling, within a radius of 5-miles of selected survey sites.

Travel Plan:
Yes 2 days
No 5 days

This data displays the number of surveys within the selected set that were undertaken at sites with Travel Plans in place, and the number of surveys that were undertaken at sites without Travel Plans.

PTAL Rating:
No PTAL Present 7 days

This data displays the number of selected surveys with PTAL Ratings.
LIST OF SITES relevant to selection parameters

1 ES-03-A-03 MIXED HOUSES & FLATS EAST SUSSEX
   SHEPHAM LANE
   POLEGATE
   Edge of Town
   Residential Zone
   Total Number of dwellings: 212
   Survey date: MONDAY 11/07/16
   Survey Type: MANUAL

2 ES-03-A-04 MIXED HOUSES & FLATS EAST SUSSEX
   NEW LYDD ROAD
   CAMBER
   Edge of Town
   Residential Zone
   Total Number of dwellings: 134
   Survey date: FRIDAY 15/07/16
   Survey Type: MANUAL

3 KC-03-A-04 SEMI-DETACHED & TERRACED KENT
   KILN BARN ROAD
   AYLESFORD
   DITTON
   Edge of Town
   Residential Zone
   Total Number of dwellings: 110
   Survey date: FRIDAY 22/09/17
   Survey Type: MANUAL

4 KC-03-A-06 MIXED HOUSES & FLATS KENT
   MARGATE ROAD
   HERNE BAY
   Suburban Area (PPS6 Out of Centre)
   Residential Zone
   Total Number of dwellings: 363
   Survey date: WEDNESDAY 27/09/17
   Survey Type: MANUAL

5 KC-03-A-07 MIXED HOUSES KENT
   RECUVER ROAD
   HERNE BAY
   Edge of Town
   Residential Zone
   Total Number of dwellings: 288
   Survey date: WEDNESDAY 27/09/17
   Survey Type: MANUAL

6 WS-03-A-04 MIXED HOUSES WEST SUSSEX
   HILLS FARM LANE
   HORSHAM
   BROADBRIDGE HEATH
   Edge of Town
   Residential Zone
   Total Number of dwellings: 151
   Survey date: THURSDAY 11/12/14
   Survey Type: MANUAL

7 WS-03-A-08 MIXED HOUSES WEST SUSSEX
   ROUNSTONE LANE
   ANGMERING
   Edge of Town
   Residential Zone
   Total Number of dwellings: 180
   Survey date: THURSDAY 19/04/18
   Survey Type: MANUAL

This section provides a list of all survey sites and days in the selected set. For each individual survey site, it displays a unique site reference code and site address, the selected trip rate calculation parameter and its value, the day of the week and date of each survey, and whether the survey was a manual classified count or an ATC count.

MANUALLY DESELECTED SITES

<table>
<thead>
<tr>
<th>Site Ref</th>
<th>Reason for Deselection</th>
</tr>
</thead>
<tbody>
<tr>
<td>DV-03-A-02</td>
<td>Too far west</td>
</tr>
</tbody>
</table>
### TRIP RATE for Land Use 03 - RESIDENTIAL/A - HOUSES PRIVATELY OWNED

**VEHICLES**

**Calculation factor: 1 DWELLS**

**BOLD print indicates peak (busiest) period**

<table>
<thead>
<tr>
<th>Time Range</th>
<th>ARRIVALS</th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>No. Days</td>
<td>Ave. DWELLS</td>
<td>Trip Rate</td>
<td>No. Days</td>
<td>Ave. DWELLS</td>
<td>Trip Rate</td>
</tr>
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<td>19:00 - 20:00</td>
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<td>23:00 - 24:00</td>
<td></td>
<td></td>
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</tbody>
</table>

**Total Rates:**

```
2.336  2.334  4.670
```

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: COUNT/TRP*FACT. Trip rates are then rounded to 3 decimal places.
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**Parameter summary**

- Trip rate parameter range selected: 110 - 363 (units: )
- Survey date date range: 01/01/10 - 19/04/18
- Number of weekdays (Monday-Friday): 7
- Number of Saturdays: 0
- Number of Sundays: 0
- Surveys automatically removed from selection: 0
- Surveys manually removed from selection: 1

This section displays a quick summary of some of the data filtering selections made by the TRICS® user. The trip rate calculation parameter range of all selected surveys is displayed first, followed by the range of minimum and maximum survey dates selected by the user. Then, the total number of selected weekdays and weekend days in the selected set of surveys are show. Finally, the number of survey days that have been manually removed from the selected set outside of the standard filtering procedure are displayed.
**TRIP RATE** for Land Use 03 - RESIDENTIAL/A - HOUSES PRIVATELY OWNED

**TAXIS**

**Calculation factor: 1 DWELLS**

**BOLD print indicates peak (busiest) period**

<table>
<thead>
<tr>
<th>Time Range</th>
<th>ARRIVALS</th>
<th></th>
<th>DEPARTURES</th>
<th></th>
<th>TOTALS</th>
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<td>Trip Rate</td>
<td>No. Days</td>
<td>Ave. DWELLS</td>
<td>Trip Rate</td>
</tr>
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<tr>
<td>20:00 - 21:00</td>
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<tr>
<td>21:00 - 22:00</td>
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<tr>
<td>22:00 - 23:00</td>
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<td>23:00 - 24:00</td>
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<td><strong>Total Rates:</strong></td>
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<td>0.036</td>
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<td>0.074</td>
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</table>

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

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TRIP RATE for Land Use 03 - RESIDENTIAL/A - HOUSES PRIVATELY OWNED

OGVS
**Calculation factor: 1 DWELLS**
BOLD print indicates peak (busiest) period

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TRIP RATE for Land Use 03 - RESIDENTIAL/A - HOUSES PRIVATELY OWNED

CARS

Calculation factor: 1 DWELLS

**BOLD print indicates peak (busiest) period**

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Total Rates: 2.018 2.011 4.029

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### TRIP RATE for Land Use 03 - RESIDENTIAL/A - HOUSES PRIVATELY OWNED

**LGVS**

**Calculation factor: 1 DWELLS**

**BOLD print indicates peak (busiest) period**

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- 0.260
- 0.514

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: COUNT/TRP*FACT. Trip rates are then rounded to 3 decimal places.
**TRIP RATE for Land Use 03 - RESIDENTIAL/A - HOUSES PRIVATELY OWNED**

**MOTOR CYCLES**

**Calculation factor: 1 DWELLS**

**BOLD print indicates peak (busiest) period**

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<th>DEPARTURES</th>
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<th>TOTALS</th>
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<tr>
<td></td>
<td>No. Days</td>
<td>Ave. DWELLS</td>
<td>Trip Rate</td>
<td>No. Days</td>
<td>Ave. DWELLS</td>
<td>Trip Rate</td>
</tr>
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<td>7</td>
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<td>205 0.001</td>
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</tbody>
</table>

Total Rates: 0.006 0.010 0.016

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Appendix 6

Assessment of SMA13 using Green Belt Assessment 3 methodology
### SMA 013 – Land West of Chapel Road, Smallfield

#### SMA 030 Land North of Plough Road, Smallfield

<table>
<thead>
<tr>
<th>EXTENT &amp; LOCATION OF SITE</th>
</tr>
</thead>
<tbody>
<tr>
<td>MAP OF SITE HERE</td>
</tr>
</tbody>
</table>

Proposed Development: Residential, 300 units

#### Spatial Strategy

<table>
<thead>
<tr>
<th>Is the site strategy compliant?</th>
</tr>
</thead>
<tbody>
<tr>
<td>The site is undeveloped land located on the edge of the built-up area of Smallfield, a sustainable settlement designated as Tier 2 in the Council's Settlement Hierarchy and identified as a preferred location for development as part of the spatial strategy. Accordingly, the Council consider that the site is strategy compliant and would have a significant role to play in achieving sustainable.</td>
</tr>
</tbody>
</table>

#### Green Belt Assessment

<table>
<thead>
<tr>
<th>Does the Green Belt Assessment recommend that the GB in this location should be retained/or further considered in terms of exceptional circumstances?</th>
</tr>
</thead>
<tbody>
<tr>
<td>The site was not considered through the Green Belt Assessment Part 1 nor through Part 2.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>What is the nature and extent of the harm to the Green Belt if the site is developed?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Given that the Green Belt serves the purposes of preventing sprawl and encroachment of the countryside, development of this site would result in sprawl and encroachment of the countryside and therefore would harm the ability of the Green Belt in this location to continue to serve these purposes. In addition, there is potential for harm to the ability of the wider Green Belt to meet the Green Belt purposes.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>To what extent can the consequent impacts on the purposes of the Green Belt be ameliorated or reduced to the lowest reasonably practicable extent?</th>
</tr>
</thead>
<tbody>
<tr>
<td>It is considered that sensitive design, buffers and landscaping could reduce the impact; however given the scale of the development and the form and layout of the site in relation to Smallfield, it is considered that any reduction would be limited. Furthermore as no robust and defensible boundary has been identified it would compromise the ability of the wider Green Belt to continue serving the Green Belt purposes.</td>
</tr>
</tbody>
</table>
## Other evidence base considerations

**Does the ecology evidence consider the site is ecologically suitable?**

The ecology evidence has determined that this site is Ecologically Suitable for housing development.

“The site is suitable for development. On a site of this scale, it would be possible to retain the few existing features of interest and create a new landscape structure that adds habitat diversity. The site area is 14.95 ha and a typical family housing density of 30 dph would normally allow incorporation of ecological areas into public open space. The site has an overhead line which would be retained as open space and could include hedges, swales and wildflower grassland. On the basis of a typical family housing density of 30 dph, the site could accommodate up to 450 units with a public open space structure that included sufficient habitat provision.”

**Does the landscape evidence consider the site has capacity to accommodate development in the landscape?**

The site is considered to have a low capacity for housing development. Some development would therefore be suitable in landscape terms but would need to take account of the site visual sensitivity and provide appropriate mitigation to demonstrate that any harmful impacts on the landscape are mitigated against.

**Does the Open Space Sport and Recreation Facilities Assessment consider that the site is surplus provision or can facilities be re-provided elsewhere?**

Not applicable as the site is not existing open space. However, the population resulting from proposed development on this site would generate demands for open space. These would need to be considered against the existing provision in the parish and result in policy requirements for on or off-site provision, if the site is allocated. Given the size of the site on-site provision may be able to be provided alongside other public facilities.

**Does the Sustainability Appraisal consider that the site is a sustainable location?**

It considers that the site can provide sufficient housing and has satisfactory access to the GP surgery, open countryside, buses and a primary school. There are limited employment opportunities in Smallfield; however Crawley, Horley and Gatwick Airport are accessible. However, the site is not located within 600m from an area of public open space and does not have access to a secondary school. It is greenfield and its development would be expected to lead to the loss of agricultural land. There would be a reliance on car travel to travel to Crawley and Horley, which have a broader range of facilities and for commuting purposes; if developed, sustainable transport measures and electric charging points would need to be encouraged. The site may not meet the Landscape Character Area guideline to 'conserve and enhance the landscape setting to villages and edge of settlement' but other impacts are limited. The site is on the urban edge of Smallfield.

**Is the site sequentially preferred? Would development of this site increase flood risk or impact on water quality?**

This site is wholly within Flood Zone 1 and therefore should be considered a preferred site in flood risk terms. There is a negligible risk from groundwater flooding. The site provides opportunity for water attenuation at the northern end of the site, slowing the flow of water into Smallfield when there is heavy rainfall. The site can positively contribute towards preventing flooding within the existing settlement of Smallfield.

**Is the proposed development of the site likely to result in harm that would be**

- Community Infrastructure Levy eligible/potential contributions or on-site provision of infrastructure
- Biodiversity enhancement opportunities including decreased active management of hedges, potential for
<table>
<thead>
<tr>
<th>Discussion</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Are there exceptional circumstances that would outweigh the harm to the Green Belt and justify Green Belt release?</strong></td>
</tr>
</tbody>
</table>

Having considered (i) the acuteness/intensity of the objectively assessed need for housing, (ii) the inherent constraints on supply/availability of land prima facie suitable for sustainable development and (iii) the consequent difficulties in achieving sustainable development without impinging on the Green Belt (Calverton principles (i) to (iii)) in the main report, as well as the reasonable options set out in the draft NPPF 2018, it is evident that development within the Green Belt is necessary.

In light of the above, housing development on this site would make a contribution of 300 units which would help meet the district’s housing need in the short term, consistent with the principles of sustainable development. Furthermore, the site comprises undeveloped land located on the edge of a Tier 2 settlement and as such is in a preferred location on sustainability grounds, being within close proximity to a GP surgery, a primary school, countryside and public transport. In addition, the site is considered, in principle, suitable for development from a landscape and ecology perspective subject to mitigation measures.

The Green Belt in this location serves to prevent sprawl and encroachment on the countryside; it also makes a significant contribution to openness. The sensitive design of development and use of buffers and landscaping may reduce its impact however given the scale of development, and the relationship with the form of the settlement, it is considered that the harm arising would still be significant. There is also potential for harm to the wider Green Belt as no robust and defensible boundary currently exists. Furthermore, the site is not within a satisfactory distance to secondary schools and there would be some reliance on private cars to access facilities and employment.

The site has negligible risk of flooding being in Flood Zone 1 but does present a major opportunity to slow the flow of water into Smallfield at times of flooding, and as such would provide wider benefit to the local community affected by flooding.

The development would also attract CIL, and as such would contribute towards infrastructure needed to support the growth of the district. In addition this site, can provide benefits to the local community, helping to reduce floodwater entering Smallfield and by providing on-site facilities possibly linked to the Primary School. Other public facilities could also be provided as needed. The site would therefore contribute to a wide range of community benefits including required local highway improvements. Its development would also provide the opportunity to secure biodiversity enhancement opportunities.

**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.**
and serve to meet the exceptional circumstances of this site?

| Whilst the site boundary contains intermittent trees and hedges, these are not considered to be particularly defensible. The allocation of this site would need to include a policy requirement for the creation of a suitable and defensible boundary as part of development. |
Appendix 7

Regulation 18 consultation representations dated 01/12/16 including:

- Appendix 1 Allen Scott Landscape Review
- Appendix 2 Comparative Assessment Table
- Appendix 3 Comparative Sustainability Objectives Matrix
1.0 INTRODUCTION

1.1 Rydon hold an interest in land to the west of Chapel Road and north of Cary’s Wood, Smallfield, and are promoting it for residential development. It has a site area of around 15 ha and could accommodate around 4–500 houses with associated uses. It is well related to the settlement of Smallfield and adjoins the settlement boundary on its southern and south-western boundaries with frontage development along the other side of Chapel Road extending northwards for almost the full length of the eastern site boundary. It has good access links to the village centre and an extensive frontage to Chapel Road where RPS Highway Consultants have established that two access points can be readily accommodated and with a bus stop on Chapel Road. The site is generally unconstrained being in Flood Zone 1 and comprising a single parcel of Grade 3B agricultural land with no ponds, woodland or important trees or hedgerows within the main body of the site.

1.2 The site was assessed in the HELAA 2016 (site reference: SMA 013) as being suitable to accommodate development, available and achievable. Its status was therefore assessed as developable and capable of coming forward after 5 years, should the site be allocated in the Local Plan. Rydon consider that there would be nothing to stop the site coming forward for a start within 5 years. The estimated yield was 370 dwellings taking account of a buffer to electricity pylons crossing the site, although the electricity lines can probably be put underground, allowing for a higher yield.

1.3 The site lies within the Green Belt as currently designated and is not identified as part of any Category 2 Green Belt Site within an Area for Further Investigation. It is therefore a Category 3 Site – namely within the Green Belt but outside any Area for Further Investigation. Within the Category 3 designation the site consultation document has assessed the site as being within an overall categorisation as a ‘Red’ site because the Landscape Capacity and Sensitivity Study 2016 assessed the site as having a low capacity to accommodate development on landscape grounds. This categorisation means that the site would no longer be considered for allocation in the Local Plan going forward.
1.4 Rydon consider that this categorisation is not a realistic assessment and that, if the site does not form part of the further consideration of sites in the Local Plan, then an important development opportunity will be missed. Rydon have commissioned an individual Landscape Assessment of the site and this concludes that it should properly be assessed as having a medium/high capacity to accommodate development. The site is generally unconstrained and a re-working of the Sustainability Assessment demonstrates that it is one of the most sustainable development sites on the edge of Smallfield. This representation therefore seeks the re-categorisation of this site to ‘Amber’, so that it can be further considered in the next stages of the Local Plan process.

1.5 Smallfield is a key settlement for the delivery of new housing. It is classified as a semi-rural service centre but in terms of landscape/environmental sensitivity and contribution to the purposes of the Green Belt it is potentially more suited to expansion than the higher order urban settlements. Flooding is a constraint, but this is largely confined to the river corridor running through the settlement. In addition, the Environment Agency have indicated that they would welcome an initiative for a Flood Alleviation Scheme in the village. This could potentially form part of a development package for the village, turning a constraint into an opportunity. The HELAA had identified development opportunities, predominantly to the north and south of the settlement outside the flood plain and capable of delivering up to 1625 new dwellings. It is well located to serve the Gatwick employment hub and enjoys a good range of existing facilities. Additional facilities, such as a new secondary school, can be provided in the context of a larger development package, but would not be viable if smaller numbers are proposed. There is therefore an argument for a sizeable number of new dwellings being directed to Smallfield.
2.0 GREEN BELT

2.1 In terms of the purposes of the Green Belt the Technical Assessment of Green Belt identifies some possible urban sprawl to the south of Smallfield which may have some scope for consolidation. However, much of the land that could be released for housing is unremarkable agricultural land that contributes little to the main purposes of the Green Belt.

i. Checking urban sprawl - this is addressed by the planned release of new housing allocations and redefining the Green Belt boundary which can prevent sprawl which, by definition, is an unplanned and cumulative process.

ii. Preventing settlements merging - there is no issue at Smallfield. The Technical Assessment confirms that the settlements of Smallfield and Outwood are such a distance from each other that it would be highly unlikely that they would merge.

iii. Safeguarding the countryside from encroachment - the surroundings of Smallfield include some sporadic development but comprise mainly open countryside and farmland. Meeting housing need will inevitably involve the loss of some countryside and farmland. The quality of both around Smallfield is at the lower end of the scale and any impact is therefore minimised. There will be opportunities to soften the urban edge with new settlement boundaries which can enhance the transition between the settlement and the surrounding countryside.

iv. Preserving historic character - there is no special heritage interest in or around Smallfield

v. Assisting in urban regeneration - opportunities for urban regeneration are not a widespread feature of Tandridge District and the land around the settlement does not contribute to this Green Belt purpose.

2.2 The release of land from the Green Belt at Smallfield to meet objectively assessed housing need is a decision that would involve the least degree of impact upon the purposes and objectives of Green Belt policy across the District.
3.0 LANDSCAPE

3.1 As indicated above, Rydon have commissioned Landscape Consultants Allen Scott to carry out a review and critique of the Hankinson Duckett Associates Landscape Capacity and Sensitivity Study (October 2016) with regard to their assessment of site SMA 013 as having low capacity for housing development. The Allen Scott review finds that this assessment appears to be out of kilter with the assessment of other very similar sites and its evident lack of clear landscape constraints. The LCSS scoring method is very sensitive and SMA 013 is just a point away in the sensitivity and value judgements from falling into a ‘medium’ capacity. The Allen Scott report also compares the LCSS assessment with each of the other Smallfield sites to determine whether its conclusions are consistent and appropriate in this instance. The report concludes with a recommended review of the Smallfield site and a re-ranking of SMA 013 in landscape capacity terms.

3.2 A copy of the Allen Scott report is appended to these representations. It recommends that the capacity of site SMA 013 in landscape terms should be revised as follows:-

Moderate sensitivity x Slight value = Medium-high landscape capacity.

3.3 This would justify the categorisation of site SMA 013 as an ‘Amber’ site that should progress to the next stage of the process when further evidence can be considered as to the need for the site to be released from the Green Belt and its overall suitability for housing development.
4.0 ECOLOGY

4.1 The Site-based Ecology Assessment 2016 assessed the Development Potential of Site SMA 013 as being suitable (minimal constraint). The site was described as being improved grassland of very low ecological value. The Area Analysis was that:-

"The site is suitable for development. On a site of this scale, it would be possible to retain the few existing features of interest and create a new landscape structure that adds habitat diversity. The site area is 14.95 ha and a typical family housing density of 30 dph would normally allow incorporation of ecological areas into public open space. The site has an overhead line which would be retained as open space and could include hedges, swales and wildflower grassland.

On the basis of a typical family housing density of 30 dph, the site could accommodate up to 450 units with a public open space structure that included sufficient habitat provision.

4.2 There is extensive opportunity to incorporate biodiversity in and around the development, in accordance with Paragraph 118 of the NPPF.
5.0 FLOODING

5.1 The site lies in Flood Zone 1, outside the flood plain that extends through the centre of Smallfield. In this respect Site SMA 013 has an advantage over the other Smallfield sites, many of which are affected by flooding to a greater or lesser degree.

5.2 When Rydon met with Matthew Chapman and Tal Kleiman in April 2016 to discuss the Chapel Road site, the issue of flooding in Smallfield was a key consideration. The Chapel Road site has the potential to contribute to a flood solution in Smallfield, either through the provision of compensatory flood relief or financial contributions. Most importantly it could provide new housing on land outside the flood plain. No firm conclusion could be reached in advance of the Atkins Flood Alleviation Study which is yet to be published. The potential that site SMA 013 has to play a key role in flood alleviation for the village cannot yet be finalised and for this reason alone the site should be taken forward to the next stage of the plan process. It can then be assessed in terms of further evidence, particularly the Atkins Study, of future flood alleviation proposals for Smallfield. This is a matter that is of particular concern and importance to the local residents of Smallfield and the opportunity to explore solutions needs to encompass sites that may play a part in any alleviation scheme. This includes site SMA 013.
6.0 SUSTAINABILITY APPRAISAL 2016

6.1 Appended is an "Evidence Base Comparison" table produced by Rydon which sets out the results of TDC’s own technical studies being used as an evidence base for assessment of the 10 potential residential greenfield sites around Smallfield. It seeks to apply ratings to demonstrate a ranking of those sites based on the assessment outcomes. Rydon have also included a further table which applies adjustment to reflect their own view on certain assessment outcomes. The Sustainability Appraisal is one of those pieces of evidence base (alongside HELAA, Landscape and Ecology) and is included in Rydon’s table to illustrate SMA 013’s positioning against other sites which now appear as “Amber” in the Reg18 document.

6.2 Rydon have completed a review of the Sustainability Appraisal produced by Lepus Consulting on behalf of TDC. They have applied their own scoring method to the SA impacts. Paragraph 2.2.11 of the SA does make it clear that "the impact magnitudes are not intended to be summed. For example, two ‘+’ are not considered to be equal to a single ‘++’. The scores assigned are a matter of professional judgement taking into account the baseline data, policy context and other sources of information available to inform the assessment”.

6.3 Rydon have applied the simple (++)=2, (+)=1, (O)=0, (-)=1, (-)=2 approach to their assessment as a starting point. In applying professional judgement it would appear that greatest weight is given to landscape impact when considering the area of evidence being used to reject sites in the Reg18. However, Rydon would argue that the Flood Risk category (11) of the SA warrants greater weight than some other categories. (particularly if one takes into account the impact of the latest flood maps published by the Government).

6.4 A further appendix to these representations produced by Rydon sets out the table from paragraph 3.11 of the SA and applies to it this simple scoring approach. It then goes on to adjust the SA table, where relevant, to reflect Rydon’s understanding of how the objectives are met. The adjusted results are then fed back into the bottom table on the Evidence Base Comparison table.

6.5 The SA has 16 objectives. The 10 Smallfield sites have been given equal scores in the following categories:

2. Health
3. Cultural Heritage
4. Transport
5. PDL
6. Economics
7. Employment
8. Climate Change Mitigation
10. Climate Change Adaptation
13. Contaminated Land and Soils
14. Air Quality

6.6 The only assessment areas that have differing results between the 10 sites are:

1. Housing
9. Natural Resources
11. Flood Risk
12. Water Quality
15. Landscape
16 Biodiversity.

6.7 Looking at these in turn for SMA 013:

1. Housing: (++) Likely Strong Positive Effect – Chapel Road has received highest achievable score.

9. Natural Resources: (-) Likely Adverse Effect – The criteria for this objective is to ‘use natural resources prudently’. It is understood that Lepus is assessing Agricultural Land Quality under this heading. Regardless of whether the classification is Grade 1, 2 and 3A (best and most versatile land) or Grade 4 and 5 (poor quality land), any development will result in an impact on the natural resource, so it would make sense for only neutral or negative scores to be considered appropriate as no development can ‘enhance’ the quality or availability of that resource, merely preserve. However, SMA 004, 008, 021 and 027 have been awarded a (+) positive score because they are Grade 4. At best Rydon believe this should really be a (O) neutral score, so have adjusted downwards accordingly.

Rydon note that because it is not possible to distinguish between land that is Grade 3a (best and most versatile) and 3b (moderate quality) due to the Defra maps, Lepus have applied the Precautionary Principle by assuming that all sites are 3a. Chapel Road is identified as 3. It is believed to be 3b which would mean it is not B&MV land and would be rated differently in the SA. However, the actual position will not be known until an ALQ assessment is undertaken.

11. Flood Risk: (+) Likely Positive Effect – Rydon believe there should be some recognition in the scoring that SMA 013 and 027 have the least impact on fluvial and surface water flood risk. Rydon have upgraded the SA score for these sites under Objective 11 to (++)

12. Water Quality: (O) Neutral/No Effect – considered appropriate scoring.

15. Landscape: (-) Likely Adverse Effect – Every site’s scoring in this category is at odds with the capacity judgement of the LC&SS. The
SA scoring against this objective should be consistent with TDC’s own technical study and adjusted accordingly (including adjustment to fit with Allen Scott’s recommendation for SMA 013). In order to remain consistent with the argument that certain sites needed to be downgraded to a Neutral (O) at best under Category 9 Natural Resources because the impact on ALQ can never be ‘positive’, then the same logic must be applied to the impact on landscape unless the existing landscape is despoiled in some way and needs to be improved. There is no evidence of this situation arising in respect of the HELAA sites at Smallfield. Therefore, the SA scoring for Category 11 Landscape has been adjusted to reflect the following, applying the Precautionary Principle making Medium/High = Medium and Low/Medium = low.

SMA 004 – Medium/High (30) 2 = (-)
SMA 008 – High (25) 1 = (O)
SMA 009 – Low/Medium (33) 3 = (-)
SMA 013 – Medium/High (31) 2 = (-)
SMA 014 – Low (40) 3 = (-)
SMA 020 – Low/Medium (37) 3 = (-)
SMA 021 – Medium/High (30) 2 = (-)
SMA 027 – High (22) 1 = (O)
SMA 030 – Medium (35) 2 = (-)
SMA 031 – Medium/High (27) 2 = (-)

16. Biodiversity: (O) Neutral/No Effect – this is the highest score awarded to a potential development site in Smallfield.

6.8 Based on the application of ratings to each site against the SA assessment and other TDC studies the TDC view and Rydon adjusted view of SMA 013’s position in that ranking are shown below:

HELAA 2016: TDC 1/1, Rydon 1/1
Landscape Capacity & Sensitivity Study 2016: TDC 5/5, Rydon 2/5
Site Based Ecology Assessments 2016: TDC 1/2, Rydon 1/2

6.9 It is evident from Rydon’s review of the Sustainability Appraisal, both with and without Rydon adjustment, that SMA 013 ranks highly against other sites around Smallfield. It is important to note that SMA 013 scores higher than a number of the Smallfield sites now identified as ‘Amber’ in the Reg18.
6.10 The potential housing sites identified in the HELAA at Smallfield lie mainly to the north or the south of the settlement. There is therefore an argument that the ultimate selection of sites for release at Smallfield should secure a geographical spread on both sides of the settlement. This would offer more potential flood risk solutions, dilute local impacts and, in particular, minimise the effect of traffic movements because different routes could be used. The Chapel Road site provides the opportunity for this spread of development to be maintained as a choice of site location at later stages of the plan process. This choice will not be available if no northern site option remains at the further stages of the plan process.
7.0 CONCLUSIONS

7.1 There are compelling reasons why site SMA 013 should remain as a candidate in the Local Plan process of considering sites for allocation in the Plan going forward. The HELAA found it to be suitable to accommodate residential development, available and achievable. There are no obvious constraints to the delivery of housing from the site, it is flat, contains no natural features that would limit or prevent development. The man-made electricity pylons can either be put underground or incorporated into the design layout with appropriate buffers of open land. It currently has very low ecological value, but there is potential to enhance biodiversity through landscaping and open space associated with housing development. The site does not flood and has the potential to assist with future flood alleviation schemes for the village. A review of the landscape capacity of the site to accommodate housing development, including comparison with other sites in Smallfield demonstrates that a revision of the landscape capacity from ‘low’ to ‘medium high’ is justified. Taking all this into account, Rydon have shown how the Sustainability Appraisal should rank the site as one of the top candidates in Smallfield.

7.2 A site characteristic matrix such as that set out at Paragraph 3.11 of the SA is an important part of site assessment but it requires a consistent evaluation approach between sites and some assessment of overall effects. Without some arithmetical comparison it is difficult to apply objectivity to an overall assessment. As there is no prioritisation of the 16 SA objectives an arithmetical comparison with no weighting can be a useful check on the validity of outcomes. Rydon have carried out this exercise and made some adjustments to the SA scoring based mainly on empirical landscape and flood risk evidence and expert judgement. This produces a different outcome and justifies the Chapel Road site remaining part of the site assessment process moving forward. Therefore:-

(i) if the overall arithmetical comparison is made, with or without Rydon adjustments, the Chapel Road site ranks higher in the SA than a number of other sites which have been categorised as ‘Amber’ and therefore remain for consideration as the Plan moves forward.

(ii) if a decision whether to progress a site to the next stage of the plan process is not being made on the basis of an overall assessment of SA objectives but determining weight is given to a single SA objective then, in the case of the Chapel Road site, Rydon feel that the Hankinson Duckett Landscape Capacity Assessment must be considered in the light of the Allen Scott review which demonstrates that the capacity categorisation of the Site by HDA was marginal, can be justifiably adjusted and would then be more realistic in terms of comparison with the categorisation of other sites at Smallfield. Furthermore, great weight should also be given to the sustainability objective of preventing flood risk and the advantages of the Chapel Road site in this respect particularly in the light of the latest “Long Term Flood Risk” maps.
7.3 The site is well related to the settlement, lying adjacent to its northern boundary and within walking distance of local facilities. Smallfield and its environs make some contribution to the purposes of the Green Belt, but on analysis this contribution is at the lower end of the scale in comparison with other settlements across the District. It is classified as a semi-rural service centre and is well located for access to Gatwick local employment hub. There is also an opportunity to use new development initiatives to help address historic flooding issues which would be a welcome relief to local people.

7.4 For these reasons it is suggested that site SMA 013, Chapel Road, Smallfield, should be re-classified as an Amber site and be part of the consideration of further evidence as the Local Plan moves forward.

Attachments

APP. 1. Allen Scott Landscape Review December 2016
APP. 2. Comparative Assessment Tables
APP. 3. Comparative Sustainability Objectives Matrix
SITE SMA 013, CHAPEL ROAD, SMALLFIELD

REVIEW OF TANDRIDGE DISTRICT COUNCIL’S LANDSCAPE CAPACITY AND SENSITIVITY STUDY OF SITES IN SMALLFIELD

December 2016

For

RYDON HOMES
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5.0 SUMMARY SITE BY SITE COMPARISON OF LCSS RESULTS

6.0 CONCLUSION

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ii. Rating comparison between southern and northern sites
iii. Rating comparison between sizes of sites
iv. Rating comparison between amount of road frontage
v. Rating comparison between condition and appearance
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1 Photographs of Site SMA013; Chapel Road
2 Photographs of Sites SMA014 and SMA030
3 Photographs of Sites SMA020 and SMA008
4 Photographs of Sites SMA004 and SMA027
5 Photographs of Sites SMA021 and SMA031
6 Photographs of Site SMA009

APPENDIX A: Extract of Tabulated Methodology from LCSS
1.0 INTRODUCTION

1.1 This report provides a brief review and critique of Tandridge District Council’s Landscape Capacity and Sensitivity Study (HDA, October 2016) in relation to the sites in Smallfield, directed primarily on Site SMA013, Chapel Road.

1.2 The Landscape Capacity and Sensitivity Study (LCSS) assessed SMA013 as having a ‘low’ capacity for development which appears out-of-kilter with its assessment of other very similar sites and its evident lack of clear landscape constraints. The LCSS scoring method is very sensitive and SMA013 is just point away in the sensitivity and value judgements from falling into a ‘medium’ capacity.

1.3 Following a brief overview of the LCSS process, the landscape context of Site SMA013 is reviewed and subsequently compared with each of the other Smallfield sites to determine whether the LCSS’s conclusions are consistent and appropriate in this instance.

1.4 This report concludes with a recommended review of the Smallfield sites and a re-ranking of SMA013 in landscape capacity terms.
2.0 THE LANDSCAPE CAPACITY AND SENSITIVITY STUDY

2.1 The LCSS is one of a range of studies that comprise the evidence base for the emerging Local Plan.

The Surrey LCA

2.2 The LCSS states that it uses the ‘Landscape Character Assessment of Tandridge’ (Surrey LCA, HDA April 2015) as a starting point. The LCA categorises and describes the different types of landscape to assist in decision making. The highest valued and designated landscapes in Tandridge are the two Areas of Outstanding Natural Beauty, the Surrey Hills AONB and the High Weald AONB. Whilst individual sites may have distinct attributes that set them apart from the general LCA within which they fall, as a starting point for landscape assessments most sites within AONBs would be rated with the highest sensitivity and highest value. The starting point for sites falling outside of designated areas would accordingly be expected to be graded somewhat lower.

2.3 Smallfield lies well outside of these designations within the wide swathe of the ‘Low Weald Farmland’ character area. The LCSS summaries the prevalent area character ‘with its pattern of maintained hedgerows with distinctive mature oak trees’ (LCSS para 4.5), neither of which would be affected by any development of SMA013, unlike for example the adjoining site of SMA014.

2.4 The full LCA does provide more comprehensive evaluation and guidance (Surrey LCA pages 78-81). A brief review of the guidance on ‘Built Development’ shows a series of sensible and reasonable aims such as ‘Conserve the rural, largely unsettled landscape’ and ‘Conserve the pattern and character of existing settlements, resisting spread and coalescence of settlement’ but these are inevitably general and apply to all and any site around Smallfield.

LCSS Methodology

2.5 Section 2.0 of the LCSS describes the methodology used which is designed to rank sites according to their landscape sensitivity and landscape value in order to determine an overall ‘landscape capacity’ to accept development. The approach describes six stages comprising both ‘desk-based’ and ‘site-based’ work to reach these conclusions on capacity such that the basic formula is:

\[
\text{Landscape sensitivity} + \text{Landscape value} = \text{Landscape Capacity}
\]

The methodology, rightly, attempts to present these conclusions objectively through a scoring system although it also stresses that these scores are determined by professional judgement and that concluding outcomes can be further amended by professional judgement. The tabulated part of the methodology is included as Appendix A for ease of reference.

2.6 This review of the LCSS makes a distinction between the ‘objectivity’ of the scores in relation to their consistency across the numerous sites, and the ‘subjectivity’ in relation to the professional judgement that might then come into play. However, as with all landscape assessments, the reality is that it is not a science and individual preference and influences
allow some variance. In this case then it is even more important that objectivity in relation to measurable changes or loss of landscape components takes precedent in decision making. In addition it is important, in all landscape assessments, to avoid obfuscating the decision by ensuring the key relevant facts are drawn out clearly and that common sense is applied.

2.7 The scoring system is based on relevant guidance and is intended to provide fair analysis and assessment of each site. However, due to the number of factors, points and final matrix evaluation, the process is subject mainly to judgement and a little opaque whilst presenting the results with an air of authoritative and seemingly academic confidence:

- There are seven different factors of ‘landscape sensitivity’ and seven different factors of ‘landscape value’ taken into account for each site.
- Each landscape sensitivity and each landscape value factor is assessed a score of between 0 and 5.
- Depending on the final score the sensitivity rating and value rating of each site may fall into one of five judgement categories.
- The final judgement category for ‘sensitivity’ and ‘value’ is then carried forward into a matrix, where by combining the ratings for each one results in one of nine possible outcomes for capacity, ranging from a ‘negligible’ landscape capacity for development up to a ‘very high’ landscape capacity for development.

2.8 Whilst the intention of this tabulated assessment technique is undoubtedly objective the reality is that each step involves subjective judgement. By necessity the statements within each factor and in relation to each site only provide a pointer to detailed landscape and visual issues and these should be further addressed in a site allocation or development management context. Ultimately, the overall suitability of a site for development will depend on a range of other considerations including access, infrastructure constraints, to other environmental considerations including flood risk, ecology, heritage and archaeology and air quality.

2.9 The methodology has been utilised as a tool to force the distinctions in each site rather than perhaps highlight that many of them share very considerable similarities. After all, all of the Smallfield sites are outside of the AONB, in the Greenbelt, largely greenfield, attached to the village by at least one boundary and topographically similar.

2.10 In landscape terms, the decisions between which site is most suitable for development might have been better served or moderated by measurable assessments of the important LCA landscape components, such as numbers of mature oaks threatened, metres of hedgerow lost, ancient woodland compromised and so on.

The Smallfield Sites – overview of LCSS results

2.11 Excluding the employment and traveller sites, there are ten sites around Smallfield. These are shown on Figure 1 (Smallfield Analysis Plan - extract from LCSS) and a brief summary of the LCSS results provided in Table I below:
<table>
<thead>
<tr>
<th>Site</th>
<th>Sensitivity Score and Rating</th>
<th>Value Score and Rating</th>
<th>Capacity Judgement</th>
</tr>
</thead>
<tbody>
<tr>
<td>SMA 004: Redehall Road</td>
<td>17 Moderate</td>
<td>13 Slight</td>
<td>MEDIUM/HIGH</td>
</tr>
<tr>
<td>SMA 008: South of Plough Road</td>
<td>14 Slight</td>
<td>11 Slight</td>
<td>HIGH</td>
</tr>
<tr>
<td>SMA 009: Lower Broadbridge Farm</td>
<td>22 Substantial</td>
<td>11 Slight</td>
<td>LOW/MEDIUM</td>
</tr>
<tr>
<td>SMA 013: Chapel Road (the Rydon site)</td>
<td>22 Substantial</td>
<td>15 Moderate</td>
<td>LOW</td>
</tr>
<tr>
<td>SMA 014: Rookery Hill</td>
<td>22 Substantial</td>
<td>18 Moderate</td>
<td>LOW</td>
</tr>
<tr>
<td>SMA 020: Green Farm Cottage</td>
<td>23 Substantial</td>
<td>14 Slight</td>
<td>LOW/MEDIUM</td>
</tr>
<tr>
<td>SMA 021: Greenleas House</td>
<td>17 Moderate</td>
<td>13 Slight</td>
<td>MEDIUM/HIGH</td>
</tr>
<tr>
<td>SMA 027: May Cottage (part of SMA 004)</td>
<td>13 Slight</td>
<td>9 Slight</td>
<td>HIGH</td>
</tr>
<tr>
<td>SMA 030: North of Plough Road</td>
<td>20 Moderate</td>
<td>15 Moderate</td>
<td>MEDIUM</td>
</tr>
<tr>
<td>SMA 031: Bridgeham Farm</td>
<td>15 Moderate</td>
<td>12 Slight</td>
<td>MEDIUM/HIGH</td>
</tr>
</tbody>
</table>
3.0 INITIAL ANALYSIS OF LCSS RESULTS

3.1 Regardless of the permutations available in the methodology the important aspect is whether the application of professional judgement has been influenced by other factors and consistently applied. An initial analysis of the results shows some emerging patterns which raise some queries regarding the decisions made and the subsequent results.

Southern and Northern Sites

3.2 Re-ordering the sites to reflect those in the south and those in the north reveals a clear preference for accepting landscape capacity in the southern sites as Table ii below:

<table>
<thead>
<tr>
<th>Southern Sites</th>
<th>Capacity Judgement</th>
</tr>
</thead>
<tbody>
<tr>
<td>SMA 004: Redehall Road</td>
<td>MEDIUM/HIGH</td>
</tr>
<tr>
<td>SMA 008: South of Plough Road</td>
<td>HIGH</td>
</tr>
<tr>
<td>SMA 009: Lower Broadbridge Farm</td>
<td>LOW/MEDIUM</td>
</tr>
<tr>
<td>SMA 020: Green Farm Cottage</td>
<td>LOW/MEDIUM</td>
</tr>
<tr>
<td>SMA 021: Greenleas House</td>
<td>MEDIUM/HIGH</td>
</tr>
<tr>
<td>SMA 027: May Cottage (part of SMA 004)</td>
<td>HIGH</td>
</tr>
<tr>
<td>SMA 031: Bridgeham Farm</td>
<td>MEDIUM/HIGH</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Northern Sites</th>
<th>Capacity Judgement</th>
</tr>
</thead>
<tbody>
<tr>
<td>SMA 013: Chapel Road (the Rydon site)</td>
<td>LOW</td>
</tr>
<tr>
<td>SMA 014: Rookery Hill</td>
<td>LOW</td>
</tr>
<tr>
<td>SMA 030: North of Plough Road</td>
<td>MEDIUM</td>
</tr>
</tbody>
</table>

3.3 There is no over-riding landscape reason why this should be the case. The Tandridge LCA makes no distinction between the quality and value of the landscape to the north or south of Smallfield. A distinction that does exist, evidenced from both the OS map and GoogleEarth aerial, is that the field pattern around the southern sites is smaller and more intricate. This might suggest an ability to absorb development but unequivocally and equally suggests that there are more landscape components including hedgerows and trees that would be affected.

Size of Sites

3.4 Re-ordering the sites in approximate size order reveals a clear preference for accepting landscape capacity in the smaller sites as Table iii below:

<table>
<thead>
<tr>
<th>Size (Smallest to largest order)</th>
<th>Capacity Judgement</th>
</tr>
</thead>
<tbody>
<tr>
<td>SMA 027: May Cottage (part of SMA 004)</td>
<td>HIGH</td>
</tr>
<tr>
<td>SMA 008: South of Plough Road</td>
<td>HIGH</td>
</tr>
<tr>
<td>SMA 031: Bridgeham Farm</td>
<td>MEDIUM/HIGH</td>
</tr>
<tr>
<td>SMA 021: Greenleas House</td>
<td>MEDIUM/HIGH</td>
</tr>
<tr>
<td>SMA 004: Redehall Road</td>
<td>MEDIUM/HIGH</td>
</tr>
<tr>
<td>SMA 030: North of Plough Road</td>
<td>MEDIUM</td>
</tr>
<tr>
<td>SMA 013: Chapel Road (the Rydon site)</td>
<td>LOW</td>
</tr>
<tr>
<td>SMA 009: Lower Broadbridge Farm</td>
<td>LOW/MEDIUM</td>
</tr>
<tr>
<td>SMA 020: Green Farm Cottage</td>
<td>LOW/MEDIUM</td>
</tr>
<tr>
<td>SMA 014: Rookery Hill</td>
<td>LOW</td>
</tr>
</tbody>
</table>
3.5 There is no specific factor within the methodology concerning objective measurement of size or judgement as to size. The results above may suggest a reasonable bent towards smaller sites appearing more discreet, imagining that development would always be less prominent in the landscape if it is smaller. However this clearly raises questions as to whether the development of a number of smaller sites spread through the village might not have a higher cumulative impact than one or two larger contained sites with greater capacity for mitigation.

3.6 The identification of a small site as having a ‘high’ capacity for development should not be taken to mean the whole area has potential for development. Similarly the identification of a large site as having a ‘low’ capacity for development should not be taken to mean the whole area does not have some potential for development. This is quite obvious in the example of either SMA013 or SMA014, both larger sites, where the southern portions of the sites abut existing modern development and the northern parts more open countryside. A capacity grading across these larger sites would on a common sense level at least suggest a potential higher capacity where the site joins existing settlement edges becoming less so the further away the site extends. The larger sites may therefore offer much greater flexibility and higher levels of mitigation than the smaller sites.

**Road Frontage**

3.7 Re-ordering the sites according to the amount of road frontage each share reveals a general preference for accepting higher landscape capacity in those with less frontage but also some inconsistencies as Table iv below:

<table>
<thead>
<tr>
<th>Amount of frontage (Least to most order)</th>
<th>Capacity Judgement</th>
</tr>
</thead>
<tbody>
<tr>
<td>SMA 020: Green Farm Cottage</td>
<td>LOW/MEDIUM</td>
</tr>
<tr>
<td>SMA 027: May Cottage (part of SMA 004)</td>
<td>HIGH</td>
</tr>
<tr>
<td>SMA 008: South of Plough Road</td>
<td>HIGH</td>
</tr>
<tr>
<td>SMA 021: Greenleas House</td>
<td>MEDIUM/HIGH</td>
</tr>
<tr>
<td>SMA 031: Bridgeham Farm</td>
<td>MEDIUM/HIGH</td>
</tr>
<tr>
<td>SMA 009: South of Broadbridge Farm</td>
<td>LOW/MEDIUM</td>
</tr>
<tr>
<td>SMA 004: Redehall Road</td>
<td>MEDIUM/HIGH</td>
</tr>
<tr>
<td>SMA 030: North of Plough Road</td>
<td>MEDIUM</td>
</tr>
<tr>
<td>SMA 013: Chapel Road (the Rydon site)</td>
<td>LOW</td>
</tr>
<tr>
<td>SMA 014: Rookery Hill</td>
<td>LOW</td>
</tr>
</tbody>
</table>

3.8 There is no specific factor within the methodology concerning road frontage but two relating factors which are scored are the visibility of the site and public access of the site. Again it might be reasonable to accept that those sites with a greater road frontage are inherently more visible and therefore any development will be more prominent. However this disguises the important distinction between a glimpse across a field whilst driving into the village edges and a more valuable experience of enjoying walking across the field on a public footpath.

3.9 There is also a distinction to make in road hierarchy and the value attributed to views available from them. In usual LVIA terms a motorist on the M23, with potential glimpses to SMA014 and SMA009, would be considered less sensitive to change than a motorist on say Broadbridge Lane, a country lane with glimpses of both SMA009 and SMA031. Similarly a motorist on a
country lane would be considered less sensitive to change than a walker on a footpath crossing a field such as those that cross SMA021, SMA014 and SMA020.

3.10 The emphasis and scoring of these factors in relation to SMA013 thus appear inconsistent. SMA013 has been ascribed a ‘low’ capacity for development, largely because of the change in character that will be seen by road users as they drive into the village. Compare this to SMA021 that has been ascribed a ‘medium-high’ capacity for development even though the changes in character will be catastrophic for uses of the public footpath network that passes through the middle of it. Likewise SMA020 which has a ‘low-medium’ capacity and footpaths that pass through the site itself, and SMA009 also ‘low-medium’ capacity that is surrounded on three sides by public footpath and bridleways. This issue is returned to below in the site by site comparisons.

Condition as a Result of Landscape Management

3.11 The assessment of ‘Inherent Landscape Quality’, of which the condition of the land forms a part, is one of the factors in the judgement in the landscape sensitivity table and probably also influences the assessment of ‘Perceptual Aspects’ one of the factors in the judgement in the landscape value table. Poor condition in this context appears to be based on the appearance of the site largely due to the way in which it is being managed.

3.12 Re-ordering the sites according to the condition of the current landscape management, as Table v below, reveals a preference for accepting higher landscape capacity in those that are less well maintained and essentially ‘scruffier’. For example if native field hedgerows have been allowed to grow to a height of 3m+ this may serve to screen the site from the adjoining road (such as the case SMA031) but ultimately leads to a loss of density at lower levels and a greater risk of future residential pressure to cut hedgerows down. This is of particular concern for the smaller sites such as SMA031 which is rated as having a ‘medium-high’ capacity for development, largely due to its screening overgrown hedgerow. In all likelihood this would be under intense pressure from the development of such a small site.

3.13 Similarly sites that are largely unmanaged return to rough tussocky grass (such as parts of SMA004) or are perceived as ‘untidy’ due to becoming horse paddock or for used for unsightly storage (such as SMA021). However in these cases more active and appropriate management would return their more pleasant rural attributes.

<table>
<thead>
<tr>
<th>Appearance (Least managed and untidy to well managed)</th>
<th>Capacity Judgement</th>
</tr>
</thead>
<tbody>
<tr>
<td>SMA 021: Greenleas House (north part)</td>
<td>MEDIUM/HIGH</td>
</tr>
<tr>
<td>SMA 004: Redehall Road</td>
<td>MEDIUM/HIGH</td>
</tr>
<tr>
<td>SMA 027: May Cottage (part of SMA 004)</td>
<td>HIGH</td>
</tr>
<tr>
<td>SMA 008: South of Plough Road</td>
<td>HIGH</td>
</tr>
<tr>
<td>SMA 014: Rookery Hill</td>
<td>LOW</td>
</tr>
<tr>
<td>SMA 031: Bridgeham Farm</td>
<td>MEDIUM/HIGH</td>
</tr>
<tr>
<td>SMA 009: Lower Broadbridge Farm</td>
<td>LOW/MEDIUM</td>
</tr>
<tr>
<td>SMA 020: Green Farm Cottage</td>
<td>LOW/MEDIUM</td>
</tr>
<tr>
<td>SMA 013: Chapel Road (the Rydon site)</td>
<td>LOW</td>
</tr>
<tr>
<td>SMA 030: North of Plough Road</td>
<td>MEDIUM</td>
</tr>
</tbody>
</table>
3.14 If it is accepted that overgrown hedgerows are a reasonable factor to take into account in the assessment of visibility (but not in assessment of condition) likewise the opportunity for managed hedgerows to grow out must be recognised. The hedgerow bounding SMA013 could have been allowed to grow up and additional tree planting readily added to it, which would have screened much of the view from the road. Thus a change in any management regime can have positive or negative effects on any piece of land within one or two seasons, hence must be viewed as being in a temporary and reversible state.

3.15 At face value it seems unreasonable to reward poor or basic land management with a presumption of development potential.
4.0 LANDSCAPE REVIEW OF SITE SMA013: CHAPEL ROAD PHOTO SHEET 1

4.1 The site comprises a field just under 15ha in size and broadly rectangular. The key landscape components and visual considerations are outlined below.

Relationship to Settlement

4.2 The site joins the built up area boundary of Smallfield and lies opposite further linear residential development along Chapel Road. There is also a small cluster of development, a mix of residential, light commercial and agricultural buildings to the north. Hence around 60% of the sites boundaries directly join or lie opposite to existing development and is considered to be well related to the existing settlement.

Landform and Topography

4.3 The site falls slightly from north to south but to all intents and purposes is perceived as flat and lies at about 60mAOD. Around 1km to the north there is a gentle rise to the Outwood village ridge at approximately 110AOD but there is no inter-visibility.

Existing Vegetation

4.4 The HELAA rightly notes that the boundaries of the site are defined by relatively dense mature tree coverage on the western, northern and southern sides, with the eastern (Chapel Road) boundary more porous. The LCSS also confirms it is largely contained (refer Figure 1). Of particular note is also the wide highway verge along the Chapel Road frontage which accommodates several distinctive mature oaks and is backed by the hedgerow to the site (refer Photo 1.2). The hedgerow is managed (ie cut) to a low height which allows a view over it, which together with the oaks in the verge contribute to the character of the approach into the village. Notwithstanding final access arrangements none of this existing vegetation would need to be lost or removed by potential development.

4.5 There are no trees or other hedgerows within the site itself.

4.6 It does not adjoin any Ancient Woodland.

Public Rights of Way

4.7 There is no public access on the site.

4.8 Part of a bridleway runs alongside the western boundary between two mature hedgerows and it forms a short section of the Tandridge Border Path. To the south it continues between the existing housing to follow Weatherhill Road and Broadbridge Lane out of the village and to the north it continues between field boundaries, through the cluster of development at Burstow Lodge Farm, towards Rookery Hill.

Visual Considerations

4.9 With reference to the LCSS Smallfield Analysis Plan (repeated here as Figure 1) it confirms the site is contained to the north and west and that there are filtered views of urban edges to the
south and east which also contain views beyond the first rows of houses. Hence the site is well enclosed in the immediate environs of its boundaries and Chapel Road.

4.10 It is worth adding that there are no views to the higher ground to the north due to this containment. In the wider landscape views are therefore not available and thus impact on the landscape character beyond the immediate adjoining road is negligible. This is worth comparing to sites such as SMA030 and SMA020 in the south where there is some intervisibility between them and the ridge to the north, in the case of SMA020 albeit a further 0.75k or so away (refer to Photos 2.2 and 3.2).

4.11 The most sensitive visual receptors would normally be considered surrounding residents. In addition to the filtered urban views the LCSS also notes the well vegetated boundaries of both the properties around the site and the site itself. Due to this screening, the set back of the houses along Chapel Road and the road itself clearly limits the potential visual impact of any proposed development on existing residents evidenced by the photograph in the LCSS (Photo 164, page 246,) as well as those on Photosheet 1. A sensible and sensitive approach to any proposed development layout and mitigation would readily minimise any potential remaining impact to those of minor or negligible considerations.

4.12 There are some gaps in the hedgerow to the bridleway alongside the western boundary which afford glimpses into and across the site. These are mentioned in the LCSS tabulated assessment under the Landscape Sensitivity factor of ‘Views’ as being ‘close range’. This is true but they are still passing glimpses and occasional (refer Photo 1.4). These cannot be considered defining views or significant views from the bridleway. As would be true of any hedgerow these gaps can be easily and readily gapped up with more planting and the whole width reinforced if felt necessary as part of a landscape mitigation scheme. It is unlikely that any landscape and visual assessment undertaken as part of any future proposed development would consider the long term impact on the bridleway to be anything other than minor or negligible.

**View from Chapel Road**

4.13 Hence the remaining visual issue boils down to the view across the site from Chapel Road which is represented by the photograph used in the LCSS. This one aspect heavily influences several judgements made in the factors of the tabulated assessments and the resulting scores, shown below as Table vi namely:

<table>
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<th>Landscape Sensitivity</th>
<th>Score out of 5</th>
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<tr>
<td>Contribution to the setting of surrounding landscape/settlement</td>
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<tr>
<td>Views (visual sensitivity)</td>
<td>5</td>
</tr>
<tr>
<td>Potential for mitigation</td>
<td>4</td>
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<table>
<thead>
<tr>
<th>Landscape Value</th>
<th>Score out of 5</th>
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</thead>
<tbody>
<tr>
<td>Local Distinctiveness</td>
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</tr>
<tr>
<td>Recreation and public access / locally valued spaces</td>
<td>3</td>
</tr>
<tr>
<td>Perceptual Aspects</td>
<td>3</td>
</tr>
</tbody>
</table>
4.14 It is acknowledged that the relative openness of the view does contribute to the character of the approach to the village but that it has been considerably over-represented in the scoring.

4.15 Across the whole width of the northern portion of the site run high voltage overhead power lines including two pylons situated within the site itself (refer Photo 1.3). These are not fully represented in the LCSS as significant visual detractors and physical constraints to development in the north, despite being highlighted as such in the HELAA.

4.16 Indeed the LCSS factor heading ‘Perceptual Aspects’ in the ‘Landscape Value’ table lists numerous detracting elements including road noise, overhead aircraft, glimpses of adjacent settlement, the pylons and glimpses of the phone mast, yet these apparently do little to outweigh the ‘good’ aspect of scenic quality which comes down to the field being ‘pleasant’ with ‘visual links to distant wooded horizon’ (this presumably means the views across the field to the trees and hedgerow along the western boundary about 350m away).

4.17 Whilst development would affect the openness of this particular view it is recognised elsewhere in the LCSS that wider views are not available hence the effect would be very localised.

4.18 Whilst there would be some change in the character of the approach into Smallfield because of the change in this view it is also recognised that the context is one of an urban edge with numerous visual detractors. As appreciated in the HELAA the northern part of the site would in any event have to remain open due to the constraints of the pylons.

4.19 Comparing this localised effect with other sites that share road frontage and/or much wider views and the 5 out of 5 score is hard to understand and appears inconsistent. For example both SMA031 and SMA009 contribute to the view from the adjoining (and more rural) lane, despite SMA031 being currently better screened by unmanaged hedgerow (refer Photos 5.2 and 6.3). These are scored 3 and 2 respectively. SMA030 adjoins a road and SMA020 is set back from the road but both would still influence one of the main routes into the village. Both also are not credited with any containment in the LCSS being much more widely visible. These are scored 4 and 4 respectively.

Potential for Mitigation

4.20 As already acknowledged the current character of the approach would change if the site were to be developed. This is also true of many of the other sites in Smallfield. It is self-evident that a change in the character from an open field to one that is developed would be true of any single greenfield site anywhere and in this context would not be out-of-kilter with the current edge of settlement character.

4.21 Hence whilst new housing would be visible there is clearly scope within the sheer size of the site (bolstered by the current wide highway verge and the existing oak trees within that verge) to envisage a scheme that would minimise prominence, maintain some view across the northern part of the site and maintain an appropriately rural and set-back landscaped boundary.
5.0 SUMMARY SITE BY SITE COMPARISON OF LCSS RESULTS

Comparison with SMA014

5.1 This site lies adjacent to SMA013 and is also rated as having a ‘low’ landscape capacity for development suggesting some parity with SMA013.

5.2 It is considerably larger than SMA013, probably more than twice the size. With reference again to the LCSS Smallfield Analysis Plan (repeated here as Figure 1) it evidently has considerably more landscape components that must be considered for likely impacts and hence constraints to development, namely:

- Ancient Woodland (refer Photo 2.1)
- Public footpath running north-south through the southern part of the site
- Public footpath running east-west across the central part of the site (refer Photo 2.1)
- Public footpath running north-south along the western boundary
- A significantly longer section of Tandridge Border Path than SM013 adjoins the eastern boundary
- A significant water course crosses the middle of the site
- No containment shown except for the shared section of bridleway in the south-east corner

Other than the sharing of a smaller part of the Tandridge Border Path bridleway, SMA013 has none of these components.

5.3 In addition the following differences on SMA014 also deserve consideration in the comparison:

- 7 existing hedgerows criss-cross the site
- There is the potential for perceived coalescence due to the proximity of the cluster around Burstow Lodge Farm
- There is less association with existing housing, this being restricted to the southern boundary only
- There is inter-visibility with the Surrey Hills AONB
- There is potential imbalance of the settlement pattern SMA014 being a far north-westerly village extension

5.4 Surprisingly SMA014 scores the same as SMA013 in the landscape sensitivity assessment and only three more in the landscape value assessment. The presence of the recorded landscape components directs SM014 towards having considerably less capacity for development and coupled with the further potential considerations suggests that the sites actually have little parity.

5.5 On this comparison alone it would suggest that SMA013 is miscategorised and should be rated as having a higher capacity for development.
Comparison with SMA030

5.6 This site lies on the eastern edge of Smallfield adjoining open countryside to the east and north. It is rated as having a ‘medium’ landscape capacity for development and hence judged less sensitive and less valuable than SMA013.

5.7 It is well associated with housing along its western boundary although these have a more open outlook than those houses around SMA013 such that potential visual impacts could be higher.

5.8 Its long eastern boundary adjoins open fields and following site checks it is clear that views would be readily available from the footpath running parallel with the boundary to the east which currently enjoys an open and largely rural aspect. Views would also be available from some parts of Cogman’s Lane to the east (refer Photo 2.3) which is also a distinctive rural lane.

5.9 There is no containment to the north such that open fields to the north and up to the high ground are also likely to be affected.

5.10 With reference to the LCSS Smallfield Analysis Plan (Figure 1) the following landscape components, not present on SMA013, bear some consideration:

- Ancient Woodland touching the north-west corner
- A significant water course contiguous with the northern boundary
- No containment shown – and thus views from high ground to the north (refer Photo 2.2)

5.11 In addition the following differences deserve consideration:

- An existing hedgerow crosses the northern portion (refer Photo 2.2)
- Whilst a country pub and car park fronts the site between the road any housing would still be partially visible on the approach into Smallfield
- Only aircraft noise is noted as a detractor
- There is potential imbalance of the settlement pattern extending the ‘rectangular’ form further to the east

5.12 SMA030 scores the same as SMA013 in the landscape value assessment and two less in the landscape sensitivity assessment. Other than the Chapel Road view discussed in Paragraph 4.13 above it is very hard to understand how SMA013 could possibly be considered more sensitive given the more open countryside nature of SMA030 and the acknowledgement within the LCSS of additional landscape components and a lack of containment.

5.13 This comparison also points to SMA013 being miscategorised and that it should be rated at least on an equal capacity footing as SMA030 if not higher.

Comparison with SMA020

5.14 This site is located on the south-eastern edges of Smallfield and shares some similar characteristics to the two sites compared above, being much larger than SMA013 and
adjoining open countryside. It is rated as having a ‘low-medium’ landscape capacity and hence with greater development potential than SMA013.

5.15 It is immediately apparent that potential development of the this site could lead to actual and perceived coalescence with the large cluster of development south of Smallfield around Redehall Road and Cross Lane.

5.16 Whilst it is set back from Plough Road, one of the main approaches into Smallfield, it would clearly be visible from it due to the northern and north-eastern boundaries being so close. Although the site is removed from Plough Road by the Cricket Club (refer Photo 3.1), the club enjoys an open outlook commensurate with its use and role in the village. Development on this site would compromise this important social and community function.

5.17 Similarly and again with reference to the LCSS Smallfield Analysis Plan (Figure 1), the following landscape components are present which are not for SMA013:

- Public footpath running north-south along the eastern boundary
- Public footpath running diagonally across the central part of the site
- Public footpath linking the above to the cricket club
- No containment shown

5.18 In addition and unlike SM013:

- There are six existing hedgerows crossing the site
- Potential and significant visual impact on a community use and common land
- Only aircraft noise is noted as a detractor
- There would be evident and significant imbalance of the existing settlement pattern
- There are reciprocal views to higher ground in the north (refer Photo 3.2)

5.19 SMA020 scores one more than SMA013 in the landscape sensitivity assessment and one less in landscape value but is inexplicably rated as having a ‘low-medium’ capacity for development.

5.20 This comparison also points to SMA013 being miscategorised, it has many benefits over SMA020 and should be rated as having a higher capacity for development.

**Comparison with SMA008**

5.21 This is a small site located on Plough Road and well-associated with the settlement pattern adjoining housing to the west and opposite to the north. It is also shown as enjoying containment to the south. It is rated as having a ‘high’ landscape capacity for development.

5.22 Whilst clearly having a good potential for development it is still relevant to highlight that there would be some character changes to Plough Road, a main route into Smallfield, and some visual impact on adjoining houses (refer Photo 3.3). Also the points discussed in Paragraph 3.6 above, concerning the cumulative effect of small sites required to fulfil housing demand and the current management of the site being an influence, (the site being used as a small paddock and sporting an overgrown hedge to the road frontage), should also be noted.
Comparison with SMA004

5.23 SMA004 lies to the south and behind the Plough Road frontage but joining Redehall Road, another main route into Smallfield. It is rated as having a ‘medium-high’ landscape capacity.

5.24 The LCSS does not show any landscape component constraints and shows some containment along the north-western edges. There is however a footpath running from SMA020 and along the southern boundary of SMA004/027 which would clearly be affected by any development (refer Photos 4.1 and 4.2). Views from this footpath are noted in the LCSS and are very similar to the gappy views from the bridleway adjacent to SMA013 but in this case are not referred to as ‘close range’.

5.25 It is also comparable with SM013 in terms of its relationship to the existing settlement pattern. The road frontage is with Redehall Lane to the south and this boundary is currently well-screened by overgrown hedgerow and trees (refer Photo 4.3). There is existing housing opposite this boundary and whether it is desirable to maintain the boundary high or to reflect a built edge would be a matter for some detailed consideration. Nonetheless any development is still likely to have some visual impact on the approach. This is also noted in the LCSS as views being available to adjacent properties on Redehall Road. However in this case, the fact that the existing hedgerow and trees have been allowed to grow un-checked, means that potential for changes in views on the approach, and pressure to top the hedgerow, have not been fully taken into consideration.

5.26 Unlike SMA013 however the development of this site, whether it be highly visible or not, would result in the physical coalescence of Smallfield with the large cluster of development to the south, effectively completing ribbon development all along Redehall Road. This would be considerably more apparent if SMA027 were also brought forward.

5.27 Unlike SMA013 as well, this site has a mature tree and hedgerow belt running through the southern portion and three other hedgerows within the site, one of which also contains mature trees.

5.28 Also the point concerning land management discussed in Paragraph 3.13 above, is relevant here, the site being poorly managed with rough ground, an old caravan and arisings being left in view from the public footpaths (Refer Photos 4.1 and 4.2).

5.29 SMA004 scores considerably less than SMA013 in both the landscape sensitivity and landscape value assessment whilst being comparable in many ways and each sharing other positives and negatives.

5.30 This comparison also points to SMA013 being miscategorised and that it should be rated at least as having a ‘medium’ capacity for development if not on an equal capacity footing as SMA004 at a ‘medium-high’ capacity.
Comparison with SMA027

5.31 SMA027 is the small school site in the south-west corner of SMA004 joining Redehall Road (rear view in Photo 4.2).

5.32 It is not comparable to SMA013 being a brownfield site. However, its re-development as housing would be a change in character and would further contribute to the change in the approach to Smallfield adding to the ribbon development of Redehall Road. As noted above, if brought forward with SMA004 this effect would be exacerbated.

Comparison with SMA021

5.33 This site is located on the south side of Smallfield and shares some similar characteristics to SMA004 compared above. It adjoins Wheelers Lane and Redehall Road and open countryside to the south. It is rated as having a ‘medium-high’ landscape capacity.

5.34 It is spatially well located within the settlement pattern. Wheelers Lane is characterised by its initial tree-lined appearance at the western end becoming more suburban to the east but still with well vegetated front gardens creating soft set-backs. The site shows limited road frontage here but at the location where any reduction in screening would have an effect on the current character. The effect on character of the approach into Smallfield is of more concern at the Redehall Road frontage where there are substantial road frontage trees forming a significant small copse. Any access arrangement would substantially impact on the character of Redehall Road in this location and suburbanise the approach.

5.35 With reference to the LCSS Smallfield Analysis Plan (Figure 1) it evidently also has considerably more landscape components than SMA013 that should be considered for likely impacts and hence constraints to development, namely:

- Ancient Woodland and woodland along the western boundary
- Public footpath running diagonally and east-west across the middle of the site (refer Photo 5.1)
- No containment to the south adjoining open countryside

5.36 In addition the following differences deserve consideration:

- A significant hedgerow containing many mature field trees runs across the centre of the site culminating in a widened copse adjacent to Redehall Road. This is shown as offering some containment to the northern portion which is correct but leaves the southern portion open.
- Whilst the northern portion appears therefore to have a higher capacity it also falls within the Environment Agency Flood Zone 2, which inevitably will increase pressure on the more sensitive southern portion.
- A further significant hedgerow runs north-south across the northern portion, adding to the limit and constraints on capacity of the northern portion.
• Filtered views would be available from the bridleway to the south to any development of the southern portion.
• There would be visual impacts arising on existing houses on Wheelers Lane and on the open space adjacent to Redehall Road which all back on to the site.

5.37 SMA021 does have a good location within the village but is not without landscape and visual constraints. It is reasonable to rate the site as having a ‘medium-high’ capacity, certainly in the northern portion but becoming less so in the southern parts. However given the presence of the public footpath and the significant hedgerows and trees (and possibly the flood zone) there will be significant impacts and practical limits on capacity.

5.38 In comparison with SMA013, although not so well related to the village centre it is not exactly far away but also has significantly less obvious landscape and visual constraints. Taking account of the view from Chapel Road at SMA013, this comparison would also point to SMA013 being miscategorised and that it should be rated at least as having a ‘medium’ capacity for development.

Comparison with SMA031

5.39 This site is the small but long rectangular site adjacent to the rural Broadbridge Lane and includes an existing house. It is rated as having a ‘medium-high’ landscape capacity and the LCSS appears to have based this largely on the level of screening the site enjoys from the roadside hedgerow and trees.

5.40 The photograph in the LCSS (Photograph 175, page 264) demonstrates the solid screening effect when viewed along the road in summer but this is actually much more porous when viewed from the north near the Wheelers Lane junction and opposite from Perrylands Lane. These are evidenced on Photos 5.2 and 5.3.

5.41 Perrylands Lane, and a section of Broadbridge Lane adjacent to the site, are part of the Tandridge Border Path and the Surrey Cycleway and should be afforded due sensitivity to change. Although there is recent development to the north, Perrylands Lane and Broadbridge Lane retain a predominantly rural outlook and this character would be affected by development on this site despite the height of the bordering vegetation.

5.42 This becomes more pertinent with the evident constraint the adjoining Ancient Woodland imposes, which joins the whole length of the eastern boundary. The necessary and minimum off-set requirements for the Ancient Woodland would squeeze development, in an already long and thin site, towards Broadbridge Lane increasing likely visual impact and adding pressure on the reliance of the hedgerow.

5.43 Generally it is not directly comparable to SMA013. There is the potential visual impact on two more rural roads and limitations due to landscape constraints. Despite these, and based largely on existing screening, SMA031 is rated ‘medium–high’ in capacity terms. In order to balance pros and cons between the two, this comparison points to both sites being rated as having a ‘medium’ capacity.
Comparison with SMA009

5.44 This site is located on the south-western edges of Smallfield and appears less well associated with the general settlement pattern. There is a filtered link with housing to the north but this is limited by trees along Perrylands Lane. In all other respects SMA009 is characterised as open fields with isolated farmhouse and agricultural buildings (refer Photos 6.1 and 6.2). It is rated as having a ‘low-medium’ landscape capacity for development.

5.45 Broadbridge Lane is a rural approach into Smallfield and therefore considered more sensitive than SMA013’s Chapel Road. Any development on this site would affect the lane’s character (see Photo 6.3) and lead to substantial suburbanising effect where there is little other built urban influence.

5.46 Furthermore the site would have significant visual impact on public footpaths that share the complete southern, western and northern boundaries of the site, the latter two also being the route of the Tandridge Border Path (refer Photo 6.1). Perrylands Lane is also being part of the Surrey Cycleway. In this respect the site also seems far more sensitive to change than SMA013 and more likely to be valued for the remaining chance to enjoy open fields from so many public footpaths, despite the proximity of the M23.

5.47 Unlike SMA013, within the site itself there are also some hedgerows containing mature trees (refer Photo 6.2).

5.48 SSMA009 scores the same as SMA013 in the landscape sensitivity assessment but three less in landscape value. It is notable that in direct comparison of the judgement on landscape value it is the factors of ‘Recreation and Public Access’ and ‘Perceptual Qualities’ that are scored lower despite clear evidence of more likely effects on the public footpath network and the more subjective but apparently similar descriptions of ‘good’ and ‘bad’ aspects of scenic quality.

5.49 This comparison also points to SMA013 being miscategorised. It may be similar in terms of visibility but it is better related to the settlement than SMA009, would have less impact on the public right of way network and on landscape components. In comparison SMA013 has a number of benefits and should be rated as having a higher medium capacity for development.
6.0 CONCLUSION

6.1 The methodology aims to deliver transparent and fair overall capacity judgements for each site. Due to the complexity of the assessment, factors and scoring process there are literally hundreds of potential permutations in combining the final scores which lead to very fine-balanced capacity ratings.

6.2 It is acknowledged that it is the purpose of the process to provide some ranking and rating but these need to be evidently consistent across the sites that bear either significant similarities and/or a balance of pros and cons.

6.3 Analysing the capacity ratings of each site show some decision patterns that may indicate factors, other than those listed in the table, have over-influenced the subjective judgements. This may not be a problem if still consistent but in reviewing site by site comparisons both subtle and more significant inconsistencies in the judgements are borne out.

6.4 Using a more direct and arguably more transparent approach to reviewing the sensitivity and value, in terms of a more tangible review of numbers and types of landscape components and likely range of landscape and visual impacts arising, show that many sites are very comparable but this parity is not borne out in the capacity ratings.

6.5 Together the patterns and comparisons raise enough queries to warrant reviewing the landscape capacity rating of all the Smallfield sites.

6.6 With regard to SMA013 specifically, sites that are on the cusp of scoring are particularly vulnerable to being miscategorised due to the multiple and complex factors that are attempted to be balanced in the tabulated assessments.

Review of the Scoring

The Landscape Sensitivity Assessment

6.7 SMA013 is just one point short of falling within the ‘moderate’ landscape sensitivity category. With reference to the site-by-site reviews above the scoring within the following factors demand some re-consideration when compared with scoring on other sites with very similar characteristics:

- **Inconsistency with existing settlement form / pattern** – this is over-stated. The site, especially the southern portion is as well related to the settlement and better than, for example, SMA030 and SMA020. The description in the table, as to the relationship of the site to countryside to the north is at some odds with the statements on containment and lack of visibility in the wider area in ‘Contribution to the setting of surrounding landscape / settlement’.
- **Contribution to the setting of surrounding landscape / settlement** – Notwithstanding the point above it is acknowledged that there is some contribution but that it is limited to
this immediate short length of Chapel Road. Hence to score almost the maximum is over-stating the contribution.

- **Views (visual sensitivity)** – The view is significantly over-stated being limited to users of this short length of road and contained by western boundary vegetation and urban edges.
- **Potential for Mitigation** – as previously discussed there would be a loss of character but this is true of most other sites to a greater or lesser extent and indeed to any greenfield site that is developed. The existing eastern boundary vegetation, width of boundary, size of site and the physical development constraints of the pylons make mitigation eminently achievable to at least the same extent as other large sites and more so than the smaller ones. Hence to score almost the maximum is vastly over-stating the limitations that mitigation measures could and would have.

**The Landscape Value Assessment**

6.8 SMA013 is also just one point short of falling within the ‘moderate’ landscape value category. With reference to the site-by-site reviews above the scoring within the following factors demand some re-consideration when compared with scoring on other sites with very similar characteristics:

- **Recreation and public access / locally valued spaces** – this is vastly over-stated when considering the large numbers of public footpaths that would be directly and indirectly affected on many of the other sites. Other spaces that might be equally or more valued spaces such as the cricket club is not even mentioned in the assessment of SMA020.
- **Perceptual aspects** – Again the number of visual detractors that are listed are not reflected in the score when compared to other sites that have far less or no detractors listed at all.

6.9 In summary the LCSS over-emphasises the visibility from Chapel Road and the importance of that view, which subsequently influences many of the other judgements, including the potential for mitigation. The character of the approach may change with development but this is true of most of the sites adjacent to or near roads and does not mean that a change in character is always for the worse. The site has generous verges, hedgerow and trees and ample space for significant off-sets and further planting to envisage a sensitive and discreet scheme that could enhance the sense of arrival into the village.

6.10 Also the LCSS does not take into account the number of visual detractors, such as the pylons, that it lists on the site. Compared with the lack of any visual detractors listed on other sites this should be reflected in a reduction in perceived landscape value.

6.11 Finally the LCSS vastly under-represents the potential impact on public footpaths, bridleways and other landscape factors that pass through, across or within many of the other sites that are simply not present on SMA013.
6.12 Using the LCSS tabulated form, SMA013 has been re-scored to reflect better consistency as below. The landscape capacity for housing development of this site has been revised by combining the re-scored sensitivity and value assessments set out below using the LCSS capacity matrix table.

6.11 It is recommended that the capacity of the site be revised as follows:

**Moderate** sensitivity x **Slight** value =

**Medium-high** landscape capacity
### Site SMA 013; RECOMMENDED RE-ASSESSMENT

#### Landscape Sensitivity:

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Amended down by one

Amended down by one

Amended down by one

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Amended down by one

Amended down by one

#### MODERATE

#### SLIGHT
FIGURE 1 AND PHOTOSHEETS
SMALLFIELD ANALYSIS PLAN (EXTRACT FROM TDC'S LCSS)

FIGURE 1

Based on mapping data licensed from Ordnance Survey, Crown copyright.

Smallfield Analysis Plan (Area 14)
See Figure 1 on page 4 for plan location
PHOTOSHEET 1

1.1: View north along Chapel Road towards south-east corner of site. NOTE: Mature trees and hedgerow screen views.

1.2: View south along Chapel Road and southern portion of site. NOTE: Cut hedgerow, wide verge, mature oaks and settlement edges.

1.3: View south-west from Chapel Road across northern portion of site and pylons.

1.4: Typical glimpse through one of the gaps from the bridleway on the site’s western boundary.

1.5: View north along Chapel Road towards south-east corner of site. NOTE: Mature trees and hedgerow screen views.

Base Map Extract from LCSS
2.1: Site SMA014. View from the public footpath crossing the northern portion of the site. Woodland is designated Ancient Woodland and the hedgerow to the left also crosses the site.

2.2: Site SMA030. View north from car park on Plough Road. NOTE: Hedgerow crossing the site, rising land and high ground and open countryside to the north and east.

2.3: Site SMA030. View west from Cogmans Lane demonstrating impact that development of this site would have on the footpath in the middle distance and on rural outlook generally.

Base Map Extract from LCSS
PHOTOSHEET 3
PHOTOGRAPHS OF SITES SMA020 and SMA008

3.1: Site SMA020. View from one of the three public footpaths crossing site in northern portion. NOTE: The Cricket Pavilion and pitch adjoining Plough Road to the right.

3.2: Site SMA020. View from one of the three public footpaths crossing site in southern portion. NOTE: Hedgerows and high ground to the north.

3.3: Site SMA008. View towards boundary of site on Plough Road.
4.1: Site SMA004. View north from public footpath adjoining the site. NOTE: Reliance on mature hedgerow and tree boundary to retain character and visibility of approach into Smallfield.

4.2: Site SMA004. View west from public footpath adjoining the site. NOTE: Mature hedgerows and visibility of school (SMA027) and housing on Redehall Road.

4.3: Site SMA004. View along boundary of site on Redehall Road. NOTE: Reliance on mature hedgerow and tree boundary to retain character and visibility of approach into Smallfield.

4.4: Site SMA004. View north from public footpath adjoining the site. NOTE: Hedgerows, mature trees, and general land management.
5.1: Site SMA021. View south into southern portion of the site from the public footpath that crosses through the site. NOTE: Mature hedgerows and trees, pastoral open countryside.

5.2: Site SMA031. View around Broadbridge Lane boundary hedgerow, a country lane showing clear visibility into the site. NOTE: Designated Ancient Woodland to rear of field.

5.3: Site SMA031. View from approach on route of Tandridge Border Path and Surrey Cycleway.
6.1: Site SMA009. Wide open views north from the public footpath adjoining south of the site. NOTE: Tandridge Border Path continues around western boundary (left of photo) and along northern boundary.

6.2: Site SMA009. View from Broadbridge Lane. NOTE: Mature hedgerows and trees, character of isolated country farmhouse.

6.3: Site SMA009. View north along Broadbridge Lane with site boundary on left. Development would clearly affect the character of this country lane and the approach into Smallfield.

Base Map Extract from LCSS
APPENDIX
There are two Areas of Outstanding Natural Beauty (AONBs) within Tandridge, the Surrey Hills and the High Weald. The NPPF makes it clear that great weight should be given to conserving landscape and scenic beauty within AONBs. The current Core Strategy (Policy CSP - Natural Beauty and CSP - High Weald) recognises that the natural environment and some built up areas of the District are excluded, and there are a number of brownfield sites and settlements which remain in the Green Belt. Green Belt considerations are addressed separately in the Council's evidence base.

As a final stage, the overall sensitivity and value ratings were reviewed to assess whether a specific site or area should be removed from the Character Area and/or the Green Belt. The process is designed to ensure that no area is removed from the Green Belt without due consideration of its landscape and other assets' values.

The Tandridge District Core Strategy was adopted by the Council in October 2008, and sets out the vision for the District for the next 20 years and provide a framework for the future improvement, development and local protection of the District and the Green Belt. The Local Plan will be informed by:

- Existing landscape features, landscape character, and views, supported by annotated photographs
- Major, substantial, and significant landscape spaces
- Existing landscape coherence
- Community and other engaged interest groups
- Landscape and physical character
- Place identity
- Neighbourhood planning
- Landscape importance
- Change and visual impact

Stage 6: Analysis and Assessment

Stage 7: Landscape Capacity for Development

Stage 8: Implementation
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Extract from Sustainability Appraisal for Tandridge District Council; Regulation 18 - Sites Consultation October 2016 (paragraph 3.11) with the application of scoring and rating.

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<th>Landscape</th>
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Rydon Adjustment to Sustainability Appraisal

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= adjusted scores
## Appendix 8

Regulation 19 Comparative Sustainability Assessment Matrix

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Sustainability Appraisal adjusted to take account of TDC and Rydon’s landscape evidence with Rydon’s application of scoring and rating.

### Table 44: Smallfield Sites Assessment Matrix

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### Extract from Sustainability Appraisal for Tandridge District Council; Regulation 19 - Sustainability Appraisal July 2018 (greenfield sites only) Table 44: Smallfield Sites Assessment Matrix

**IF SIMPLE SCORING WAS APPLIED**

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**REG 19 ALLOCATION**

- SMA 008 + 040 Reg19 allocated site HSG 03
- SMA 013 rating level with SMA 004 HSG 01
- SMA 020 rating level site HSG 01
- SMA 021 rating level site HSG 01
- SMA 027 rating level site HSG 01
- SMA 030 rating level site HSG 01
- SMA 031 rating level site HSG 01
- SMA 040 rating level site HSG 01
- SMA 041 rating level site HSG 01