Tandridge District Council – Local Plan Examination in Public
Hearing Statement

Representor number: 1052527

Matter: 6 - Housing Allocations
(HSG03: Land North of Plough Road, Smallfield)

On behalf of Landform Smallfield Limited

Introduction

This Hearing Statement is prepared on behalf of Landform Smallfield Limited (Landform), in response to the Inspector’s Initial Matters, Issues and Questions for the examination of the Tandridge District Council ‘Our Local Plan: 2033’ (the Plan) (Publication version July 2018).

Landform is promoting land north of Plough Road, Smallfield (Site HSG03) for residential development and previously submitted representations in respect of the HELAA dated September 2015, the Issues and Options Local Plan Consultation dated February 2016, a further HELAA submission in April 2016, the Regulation 18 Local Plan Consultation in December 2016 and the Regulation 19 Local Plan consultation in September 2018. The Site is allocated in the submission version for up to 120 units and supporting infrastructure under Policy HSG03.

The Site provides for sustainable housing development in itself and will also provide substantial wider local community benefits, including:

- Flood alleviation to the wider Smallfield area in collaboration with Surrey CC and EA;
- The opportunity to provide much needed housing, contributing to the District’s five-year housing supply;
- The opportunity to provide affordable housing;
- Opportunities for biodiversity enhancements;
- Opportunities for wider infrastructure improvements, including off-site junction improvements and open space contributions.

Please find below our response to the questions set out under Matter 6 (Housing Allocations) within the Inspector’s Initial Matters, Issues and Questions document.

6.20 What are the exceptional circumstances for the release of the site from the Green Belt?

The Green Belt Assessment confirmed that “as a matter of planning judgement, the site does justify the exceptional circumstances necessary to recommend amendment of the Green Belt boundary”. The assessment, in coming to this conclusion considered the OAN, the constraints on the suitable land supply, and the difficulties of achieving sustainable development without impinging on the Green Belt. Development of the Site would provide up to 120 units with 40% affordable housing and will therefore contribute to meeting the housing needs of the district at full policy level. The Site is in a sustainable location, in a Tier 2 settlement and within close proximity to a primary school, GP surgery and public transport services. Sufficient mitigation measures could be provided in respect of landscape and ecology impacts, surface water flooding and potential impacts to the setting of the listed building. The flood alleviation scheme (modelled in collaboration with the Council’s consultants) will provide for wider Smallfield flood mitigation.
6.21 Is the proposed Green Belt boundary justified and consistent with national policy as set out in paragraph 85 of the Framework?

Paragraph 85 of the Framework states that “When defining boundaries, local planning authorities should:

- ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development;
- not include land which it is unnecessary to keep permanently open;
- where necessary, identify in their plans areas of ‘safeguarded land’ between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period;
- make clear that the safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of safeguarded land should only be granted following a Local Plan review which proposed the development;
- satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period; and
- define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.” (emphasis added).

With respect to the first bullet point, the Site can deliver much-needed housing, including affordable tenure, and will contribute to Tandridge’s five-year housing supply. In addition, given its location within a Tier 2 settlement, the Site is located in a sustainable location, in close proximity to social infrastructure and transport services. The Green Belt Assessment confirms that “the Council consider that the site is strategy compliant and would have a significant role to pay in achieving sustainable [development]”.

Regarding the second and fifth bullet points, the Site is an obvious extension to the settlement of Smallfield and the proposed Green Belt boundary has been defined to ensure that a 120-unit scheme can be entirely delivered. Therefore, only land considered necessary for the delivery of housing has been released from the Green Belt.

Finally, with regards to the sixth bullet point, it is acknowledged that a sufficient landscape buffer will need to be provided to ensure a clearly defined, physical Green Belt boundary, which would reduce the potential impacts of any proposed development on the openness of the Green Belt. This is set out under the site-specific requirements of Policy HSG03.

6.22 Are the requirements for financial contributions as set out under Infrastructure consistent with national policy for planning obligations and conditions as set out in the Framework? Would the requirement to explore opportunities for junction improvements at Plough Road / Redehall Road / Chapel Road / Wheelers Lane be effective and is it justified? Is it justified to seek a financial contribution to Plough Field Park Youth provision?

Planning Obligations and Conditions

Given the capacity of the site to accommodate 120 units, there will be a need for Section 278 works to be agreed with the Highway Authority local to the Site to form the Site access junctions with Meadow View and associated sections of new footway. There will also be a requirement for the development of the Site to contribute towards improvements at the junction of Plough Road/Redehall Road/ Chapel Road/Wheelers Lane.

In addition, given that the Site partially falls within Flood Zone 2, attenuation ponds are considered necessary in order to mitigate and control flood risk both on the Site and across the wider Smallfield area. Finally, the provision of up to 120 units on the Site could result in additional demand for open and play space provision, thus any associated planning obligations are justified.
Paragraph 205 states that where planning obligations are being sought or revised, local planning authorities should take account of changes in market conditions over time and, wherever appropriate, be sufficiently flexible to prevent planned development being stalled. It is argued that any financial contributions agreed between the Council and the developer will be determined having regard to the viability of the scheme in order to allow development to come forward.

In light of the above, it is considered that the requirements for financial contributions are consistent with national policy for planning obligations and conditions.

**Junction Improvements**

Works to Meadow View to form the Site access junctions and associated footways, will be funded by the development of the Site.

Improvements at the junction of Plough Road/Redehall Road/Chapel Road/Wheelers Lane are justified and would be effective at addressing identified road safety concerns. In 2017, road safety improvements at this junction were the subject of a ‘Road Safety Outside Schools’ report to the local committee and a CIL bid by SCC, following a petition in December 2016 and a child related accident in May 2017. Development allocations in Smallfield will marginally increase traffic at this junction and the road safety improvement works should be jointly funded by development on a fair and equitable basis.

**Plough Field Park – Youth Provision**

The Council’s Open Space Study (2017) identifies shortfalls in amenity green space, children’s play space and youth play space in the Burstow area, with no youth provision at Plough Park Field. In addition, the Infrastructure Delivery Plan (2018) sets out the infrastructure requirements of the district and identifies youth provision at Plough Field Park as a medium priority. Given the capacity of the Site to accommodate up to 120 new dwellings, it is anticipated that the development will create additional demand for open and play space provision, thus a financial contribution for youth provision at Plough Field Park, for which there is already a need, is justified.

6.23 Are there any matters which would mean that the site is not deliverable or developable as per footnotes 11 and 12 of the Framework?

Appendix 2 of Tandridge District Council’s Regulation 19 Housing Topic Paper (2018) identified that first completion of the Site (Site Reference SMA030) will not happen until 2026/27, with a further 60 completions in 2027/28. It was also noted that the HELAA (2017) concludes that the Site “is suitable, available and achievable with no constraints which could render the Site financially unviable. The HELAA further confirms that the Site “is considered to be developable and capable of coming forward after 5 years, should the site be allocated in the Local Plan”. However, as set out in our representations submitted in respect of the Regulation 19 Local Plan Consultation, we can confirm that the Site is economically viable and technically deliverable and can be delivered within 5 years of receiving planning approval. In our representations, we objected to the assertion that the Site will come forward for development after 5 years and suggested that Policy HSG03 be amended to include details on phasing and delivery of the Site, making it clear that the Site can come forward for development within the period 2021-22, thus contributing to the District’s five-year housing supply. Whilst Policy HSG03 has not been updated to make reference to the phasing and delivery capabilities of the Site, our assertion that the Site can be viably developed within 5 years remains as per our representations to the Regulation 19 consultation.
6.24 Are the proposed modifications necessary for soundness?

The proposed modifications are not material in respect of the Local Plan as a whole and the Policy is considered to be sound.

BARTON WILLMORE
3 September 2019