Response to Inspector’s MIQs on Housing Allocations HSG01, HSG02, HSG03 & HSG04 by Cllr Kevin Bourne

1.0 This plan is apparently “infrastructure led” yet these policies do not give Smallfield any guarantee of infrastructure improvements. The policies are not robust, for example speaking to “explore opportunities” not to actually provide improvements. The IDP and Open Space Assessments are not plan documents so cannot be relied upon without robust policies that detail exactly what is expected rather than weak, woolly and some incorrect statements that will achieve nothing positive for the village.

HSG01: Land at Plough Road and Redehall Road, Smallfield

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

1.11 I believe there are none, beyond the need for housing numbers which has been proven in court not to be enough to justify removal from the Green Belt. In my view this site should not be considered suitable for development.

6.12 Is the proposed Green Belt boundary justified and consistent with national policy as set out in paragraph 85 of the Framework?

1.12 There is no justification for changing the existing Green Belt Boundary as there are no exceptional circumstances.

6.13 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 effective to require the provision of amenity green space in accordance with the ‘most up to date open space assessment’ when it is not part of the development plan?

1.13 Infrastructure improvements are possibly the most important factor to existing residents of the village, yet with the Infrastructure Delivery Plan not being a Plan document, there is no way Smallfield can rely upon the delivery of any of the promised infrastructure. Couple that with the wishy-washy wording of the policies attached to each housing allocation and I am left doubting financial contributions can ever be enforced to pay for the much needed improvements.
R**oads**

1.14 Smallfield is a village situated in a network of country lanes. There are zero “A roads” and only one road to the south of the village qualifies for “B road” status, the B2037. The roads through the centre of the village are unnumbered country lanes.

1.15 In the centre of the village is a double junction where the north/south running roads of Chapel Road and Redehall Road intersects with the east/west roads of Weatherhill Road, Plough Road, Wheelers Lane and New Road. Immediately next to and therefore impacting use of this double junction are the primary school and the village parade of shops. Significant traffic problems are experienced in the village every day, especially at school drop off and pick up times when this double junction grinds to a halt.

1.16 So Smallfield does not need to “explore opportunities for junction improvements” it needs actual junction improvements to solve the additional problems the inevitable increase in traffic imposed by further development will bring.

1.17 The Council should have already completed a full traffic survey in conjunction with Surrey County Council (as Highways Authority) and the report should have identified the possible solutions and associated costs. Those specifics could then be written into the policies for any acceptable housing sites in the area to contribute towards.

1.18 If the report had been completed we would then know if adding 280 more homes to the east side of the village was a good idea, or likely to exacerbate the existing road problems.

- The vast majority of local jobs in a single area are located in the Crawley/Manor Royal/Gatwick Airport zone (22.9% according to the Gatwick Diamond Economic Report 2017). This area is west of Smallfield.
- Should the 4,000 house estate at South Godstone be allowed to proceed then it’s not unreasonable to assume 22.9% of those could want to access the Crawley/Manor Royal/Gatwick Airport zone. The most direct route would be through Smallfield village, from east to west.
- For rail commuters to London and Croydon the nearest station is Horley, which is to the west of Smallfield at a distance of 2.6 miles by road - far enough for most users to drive.

1.19 Yet no traffic impact survey has been completed, so there are no concrete solutions on how the Smallfield road network could be changed to cope. Why are housing sites on the east side of the village be considered most appropriate when their residents would in all likelihood need to commute from east to west through the village centre making the daily situation worse? So no, the existing policy provision is most certainly not effective.

1.2 Given the extent of the problems, the only solution is to complete the traffic analysis prior to a final decision whether HSG01 or any other site is actually suitable, and the impact of the traffic from the site(s) be quantified and a financial contribution can then also be quantified towards the junction improvements and included in the policy conditions. This level of detail
would give the village a guarantee the road improvements actually get delivered (if the development goes ahead).

Flood

1.21 Smallfield has a significant history of serious flooding problems as the Smallfield Flood Action Group are sure to inform you so I won't repeat their information.

1.22 The general flow of water courses is from east to west (there's a theme here!) and away from the area through culverts under the M23. This is true for surface water and fluvial water which exits into the Burstow stream west of the M23 and also for the foul water system for which the sewage treatment plant is located west of the M23 as well.

1.23 There are circa 110 existing homes in roads on the east side of the village alone known to struggle with use of their showers and flushing their loos during periods of heavy rainfall. These homes would share the same foul water system as the two larger proposed sites for new development, HSG01 and HSG03. Their problems are caused primarily because the foul water drain network on the east side is predominantly a combined drain network taking both foul and surface water.

1.24 All the proposed new houses on site HSG01 would “plug in” to the existing foul water drains and would therefore add to the existing capacity problems, even if the planning requirements allow for dealing with their surface water totally separately so that zero additional surface water is allowed to enter the combined sewer system.

1.25 If this site were to proceed, I would suggest the flood related policy wording should be strengthened to include:

- All surface water must be directed away from the combined sewer network, or on-site storage must be provided to store surface water so it can be throttled into the system during zero rain periods when capacity allows.
- Fluvial flooding solutions are mandatory.
- The development is to have its own foul water storage system so foul water can be throttled into the system when capacity allows.
- All flood protection to be installed and maintained at the applicants' expense or put into a management company to ensure long term maintenance and management.

HSG02: Chapel Road, Smallfield

6.16 In terms of flood risk, is the allocation of the site justified in respect of the Sequential Test and the Exceptions Test? Has it been demonstrated that a housing development at the site would be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere?

2.11 This site backs onto Orchard Road one of the areas where existing homes suffer foul water drainage problems and surface water problems in periods of heavy rainfall.
2.12 No, it cannot be possible because flood issues have not been fully addressed in the whole area as per my points 1.21 to 1.25 above.

2.13 If this site is to be developed then the policies should be strengthened as per point 1.25 above.

**HSG03: Land North of Plough Road, Smallfield**

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

3.11 HSG03 has a genuine exceptional circumstance in it should provide the land required for two attenuation ponds to help protect the whole village from surface water flooding. These ponds, if delivered, should help to ease the serious, regular flood problems experienced by existing homeowners in the village. However, I need to question whether the policies are written robustly enough to guarantee these ponds will be fully funded and delivered? Without the attenuation ponds the exceptional circumstance no longer exists and this site would have no reason to be removed from the Green Belt.

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?

3.12 The same comments apply here as already made on HSG01 regarding the road junction improvements made in points 1.14 to 1.2.

3.13 The site is on the north side of Plough Road, with the youth provision on the south side and there is no safe way of crossing. This site should also be asked to fund a pedestrian crossing to ensure the village’s children can cross the road safely.

3.14 As well as the on-site alleviation ponds mentioned in 3.11 above, similar requirements as suggested in 1.25 should also be included to ensure this site manages the flow of foul water into the already stressed system.

**HSG04: Woodlands Garage, Chapel Road, Smallfield**

6.25 In terms of flood risk, is the allocation of the site justified in respect of the Sequential Test and the Exceptions Test? Has it been demonstrated that a housing development at the site would be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere?
4.11 This site was granted planning permission in September 2018 and there are no requirements in the existing planning permission for specific flood matters to be taken into account beyond standard SuDS requirements. It’s too late therefore to impose any further requirements to ensure the site development does not increase flood risk elsewhere.

6.27 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?

4.12 This site already has planning permission and there are no requirements in the existing permission for contributions towards any pedestrian crossing, only to pay CIL.

4.13 It is these types of error in the infrastructure detail that to me suggests unless changes are made to the policies the infrastructure improvements promised to villagers will never happen.