EXAMINATION STATEMENT - MATTER 06

HOUSING ALLOCATION - HSG 01

Tandridge District Council - Local Plan: 2033

Representations on behalf of
Crest Strategic Projects

September 2019
CONTENTS

1.0  INTRODUCTION 01

2.0  RESPONSE TO MATTER 06 – HOUSING ALLOCATIONS 03

i)  HELAA Assessment for Site 03
ii)  Deliverability 04
iii)  Developability 05
iv)  Conclusion 06

APPENDICES

APPENDIX 1:  SMA 008 - HELAA ASSESSMENT (2015)
APPENDIX 2:  SMA 004/040 – HELAA ASSESSMENTS (2017/18)
APPENDIX 3:  FLOOD/DRAINAGE NOTE (CAMPBELL REITH – AUG 2019)
1.0 INTRODUCTION

1.1 This Statement has been prepared by Barton Willmore LLP on behalf of our Client; Crest Strategic Projects, who has interests in land within Tandridge District Council (TDC).

1.2 Crest has been promoting a Site at Lower Broadbridge Farm, Smallfield (for up to c. 300 dwellings) and has submitted representations to each of the stages of the draft Local Plan as follows:

   i) Issues and Approaches (Reg 18 Consultation; Jan – Feb 2016);
   ii) Sites Consultation (Reg 18 Consultation; Nov – Dec 2017);
   iii) Garden Villages (Reg 18 Consultation; Aug – Oct 2017);

1.3 Following the Issues and Approaches consultation, Barton Willmore/Crest engaged in a meeting with TDC Officers (April 2016). The objective of this meeting was to discuss the consideration of the Site as part of the HELAA (Housing Economic Land Availability Assessment) and wider evidence base.

1.4 At the meeting, TDC Officers suggested a phased approach to development at the Crest Site, with the northern section being developed first (i.e. c. 180 units earlier in the Plan period) and the southern section (c. 120 units) being developed subsequently (later in the Plan period).

1.5 Crest as the single promoter of the Site maintains that it’s Site is “suitable”, “available” and “achievable” and thus “deliverable” either as a single/comprehensive development or through a phased approach, as above (as indicated by TDC). This is particularly important given the significant shortfall in meeting housing needs in the submitted Local Plan.

1.6 The Local Plan was submitted during the period for when transitional arrangements for applying the 2012 NPPF were in place. Reference is therefore made to the 2012 NPPF in responses to the Inspector’s questions, unless otherwise stated. These representations respond to the Inspector’s questions within Matter 06 (Housing Allocation – HSG 01) and have been considered in the context of the tests of ‘Soundness’ as set out at Para 182 of the NPPF. These require that a Plan is:
Introduction

- **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 reasonable;
- **Justified** – the plan should be the most appropriate strategy, when considered against the reasonable alternative, 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 NPPF.
2.0 RESPONSE TO MATTER 06 – HOUSING ALLOCATIONS

Issue: Are the proposed housing allocations justified, effective and consistent with national policy?

HSG01: Land at Plough Road and Redehall Road, Smallfield

Question 6.14 Are there any matters which would mean that the site should not be considered to be deliverable or developable as per footnotes 11 and 12 of the Framework?

2.1 The site allocation is not considered to be “deliverable” or “developable”. We address the reasons for this below. In the first instance, we set out the consideration of the site through the HELAA (Housing Economic Land Availability Assessment) process.

2.2 The land has been considered through the HELAA process as 3no. separate land parcels. These include (with HELAA references provided):

- SMA 008 – Northern parcel of the site;
- SMA 004 – Southern parcel of the site;
- SMA 040 – Small western parcel of the site.

i) HELAA Assessment for site

a) HELAA (2015)

2.3 SMA 008 was considered as part of the 2015 HELAA (see Appendix 1). As a single parcel, it is confirmed as being “suitable”, “available” and achievable” with a potential site yield of 40 dwellings.

2.4 SMA 004 was identified within the list of unavailable sites due to confirmation not being received that the site was available for consideration.

2.5 SMA 040 was not considered in the 2015 HELAA, presumably because it was not submitted to TDC by a willing landowner at the time.
b) HELAA (2016)

2.6 As per the 2015 HELAA, only SMA 008 was considered by TDC in the 2016 HELAA. The assessment re-affirms the site as being “suitable”, “available” and “achievable” for an estimated yield of 40 dwellings.

c) HELAA (2017/18)

2.7 SMA 004 and SMA 040 were both considered as part of the 2017/18 HELAA and both were confirmed as “suitable”, “available” and “achievable” for an estimated yield of 108 units (SMA 004) and 9 units (SMA 040) – see Appendix 2.

2.8 The 2017/18 HELAA repeats the findings of the earlier HELAAs with regard to SMA 008.

ii) Deliverability

2.9 The above demonstrates uncertainty regarding the deliverability of the allocation. The site comprises three different land parcels and well as three individual landowners and there is no evidence of a Landowners’/Collaboration Agreement being in place to bring the site forward. Such an agreement would resolve details between the landowners including potential for ransoms as well as equalisation matters. These details are not evident nor is there any evidence of a delivery/development partner (including Option Agreements with a housebuilder) in place for the site.

2.10 Conversely, Site (SMA 009) is being promoted by a National housebuilder (Crest Nicholson) and an Option Agreement is in place with a single landowner. There are no encumbrances to development at the Crest site, such as the need for equalisation or ransom agreements, and therefore we fail to see why HSG01 has been allocation and the Crest Site forms an omission site.

2.11 The uncertainty on the delivery of HSG01 further affects the 5-year supply. In this context, TDC estimates delivery of 50 units within HSG01 during the forthcoming 5-year period (2019/20 – 2023/24). This is of particular concern given the inability of the Local Plan to demonstrate a 5-year supply of housing land – as addressed in a separate Matter Statement prepared by the Tandridge Housing Forum (to which Crest is a member of).

2.12 The site has not been demonstrated to be “deliverable” by TDC or by a site promoter.
iii) **Developability**

2.13 There is a lack of evidence provided by TDC and the site promoters in terms of the ability of HSG01 to be developed from a technical point of view. We detail the relevant matters below, as follows:

**a) Drainage/Flood Risk**

2.14 Site HSG01 (the northern parcel in particular) is prone to flooding and is anecdotally referred to by local residents/the Local Parish Council as the “Duck Pond”. The site was reported to have flooded in winter 2013/14 as well as along Redehall Road.

2.15 The Flood/Drainage Note (Campbell Reith – **Appendix 3**) confirms that, whilst not in an area at risk of fluvial/tidal flooding (Flood Zones 2/3), the site contains extensive areas of surface water flooding along the northern boundary adjacent to Plough Road\(^1\). This includes an area of “high” risk on the northern boundary and “medium” risk to the south of this. There is a further area of “high risk” (in the form of a ditch) along the southern boundary of SMA 008 which provides run-off into an adjacent pond to the east. In total 36% of SMA 008 comprises land at high/medium risk of surface water flooding.

2.16 The TDC Strategic Flood Risk Assessment (SFRA) recognises that significant surface water ponding is likely in the north-west corner of the site (as well as on Plough Road). The potential for surface water flooding is however considered greater than this – as confirmed by Campbell Reith.

2.17 The SFRA goes no further in setting out mitigation measures (or whether these are feasible) in terms of surface water flooding including dealing with potential for flooding downstream. It is unclear as to the extent and scope of drainage details to be secured including the requisite mitigation (e.g. attenuation, SuDS, etc.) or whether these are feasible. Moreover, these details have not been provided/submitted by the site promoter(s) and accordingly there remains uncertainty as to the ability of the site to be developed in drainage/flood risk terms.

2.18 As above, figure 3 of the Campbell Reith note demonstrates the extent of surface water risk at the site. Campbell Reith has advised that this area would have to be kept free from development (dwellings or extensive areas of hardstanding) and there are no details from TDC/site promoter concerning mitigation for this. Furthermore, details have not been provided as to how the ditch/high-risk strip along the southern edge of SMA 008 would be maintained or culverted (or if this is feasible or viable).

---

\(^1\) Refer to Figure 3 (Campbell Reith Note).
2.19 With the northern area of the site being undevelopable, this pushes proposed dwellings to the southern parcels (away from the existing built form of Smallfield) and results in further encroachment into the countryside. This would also place unduly pressure on the eastern boundary with Green Farm – a Grade II Listed Building.

2.20 Given the flood risk/drainage position and the lack of evidence submitted in terms of mitigation, the site is therefore not considered (nor has it been demonstrated by TDC/developer) to be developable.

iv) Conclusion

2.21 The above confirms that it has not been demonstrated that the Site is “deliverable” on the basis of:

- There are three different landowners;
- There is no evidence of a Landowners’/Collaboration Agreement in place; and
- There is no evidence of a delivery/development partner in place.

2.22 Furthermore, it has not been demonstrated that the Site is “developable” on this basis of flood risk/drainage.

2.23 Site allocation (HSG 01) is therefore not considered to be “justified” or “effective” and is therefore “unsound”.
<table>
<thead>
<tr>
<th>HELAA Reference Number</th>
<th>SMA 008</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Address</strong></td>
<td>Land at Plough Road, Smallfield</td>
</tr>
<tr>
<td><strong>Site Size</strong></td>
<td>1.43</td>
</tr>
<tr>
<td><strong>Approximate Developable Area</strong></td>
<td>1.43</td>
</tr>
<tr>
<td><strong>Estimated Site Yield</strong></td>
<td>40</td>
</tr>
<tr>
<td><strong>Green Belt</strong></td>
<td>Within Green Belt</td>
</tr>
<tr>
<td><strong>Suitability</strong></td>
<td>The site is a field adjacent to the inset settlement of Smallfield. The site is flat and has frontage with Plough Road so access could be created. The site is considered suitable however as it is within the Green Belt this designation would need to change in order for the site to be developed.</td>
</tr>
<tr>
<td><strong>Available</strong></td>
<td>The site has been submitted by an Agent on behalf of the landowners so is considered to be available.</td>
</tr>
<tr>
<td><strong>Achievable</strong></td>
<td>Development of the site is considered to be achievable.</td>
</tr>
<tr>
<td><strong>Status</strong></td>
<td>Developable - Can be developed after 5 years</td>
</tr>
</tbody>
</table>

![Map of Land at Plough Road, Smallfield](image.png)
APPENDIX 2

SMA 004/040 – HELAA ASSESSMENTS (2017/18)
flooding and to the south east of the site is an area of Ancient Woodland. Both of these factors would need to be considered through the development management process. The site is accessed directly from Faygate Lane, off Eastbourne Road. This site is considered suitable but as the site is in the Green Belt this designation would need to change in order for it to be developed.

<table>
<thead>
<tr>
<th>Availability</th>
<th>The site has been submitted by the landowner and is considered available.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Achievability</td>
<td>No constraints that could render the site financially unviable are identified at this time.</td>
</tr>
<tr>
<td>Status</td>
<td>Developable - For the purposes of the HELAA, the site is considered to be developable and capable of coming forward after 5 years, should the site be allocated in the Local Plan.</td>
</tr>
<tr>
<td>Estimated Site Yield</td>
<td>134</td>
</tr>
<tr>
<td>Strategy compliance</td>
<td>Site is in accordance with the Preferred Strategy. Please note that this site falls within a broad location, considered as part of the Local Plan: Garden Villages Consultation.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>HELAA Reference Number</th>
<th>SMA 004</th>
</tr>
</thead>
<tbody>
<tr>
<td>Address</td>
<td>Land off Redehall Road</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Site Size (Hectares)</th>
<th>3.79</th>
</tr>
</thead>
<tbody>
<tr>
<td>Approximate Developable Area (Hectares)</td>
<td>3.79</td>
</tr>
<tr>
<td>Site Description</td>
<td>The site is an area on the southern edge of Smallfield, with residential properties to the west and north. The site has access from Redehall Road where a narrow access track exists, which dissect the site from west to east. The site is in existing use as agricultural land.</td>
</tr>
<tr>
<td>Suitability</td>
<td>It is considered that the site has acceptable topography and it is thought that access could be be provided by widening the existing</td>
</tr>
</tbody>
</table>
The site is considered able to accommodate development but as the site is in the Green Belt, the designation would need to change in order for it to be developed.

Availability
The site has been submitted on behalf of the landowner and is considered available.

Achievability
No constraints that could render the site financially unviable are identified at this time.

Status
Developable - For the purposes of the HELAA, the site is considered to be developable and capable of coming forward after 5 years, should the site be allocated in the Local Plan.

Estimated Site Yield
108

Strategy compliance
Site is in accordance with the Preferred Strategy.

HELAA Reference Number
SMA 008

Address
Land at Plough Road, Smallfield

Site Size (Hectares)
1.43

Approximate Developable Area (Hectares)
1.43

Site Description
The site is a field adjacent to the settlement of Smallfield. Residential properties are to the west and north, with allotments to the east and open land to the south (SMA 004).

Suitability
The site has road frontage with Plough Road and it is considered that access could be created there. The topography would enable the site to accommodate development. The northern part of the site is subject to a risk of surface water flooding. The site has a moderate risk of
### Estimated Site Yield
10

### Strategy compliance
Site is in accordance with the Preferred Strategy.

### HELAA Reference Number
SMA 040

### Address
51 Redehall Road, Smallfield

### Site Size (Hectares)
0.6

### Approximate Developable Area (Hectares)
0.6

### Site Description
The site contains a single residential dwelling, its garden and an agricultural field. It is immediately adjacent to the boundary of Smallfield. Open land (SMA 004 and SMA 021) exist to the east and west, respectively. Residential properties border the site to the north and south.

### Suitability
The site has existing access from Redehall Road as well as an existing potential access gate from Kings Mead. The topography is flat and therefore not considered to prohibit development. The site would be suitable for development, however, as it is within the Green Belt this designation would need to change in order for it to be developed.

### Availability
The site has been submitted to the HELAA process on behalf of the landowner and is therefore considered available.

### Achievability
No constraints that could render the site financially unviable are identified at this time.

### Status
Developable - For the purposes of the HELAA, the site is considered to be developable and capable of coming forward after 5 years, should the site be allocated in the Local Plan.
<table>
<thead>
<tr>
<th>Estimated Site Yield</th>
<th>9</th>
</tr>
</thead>
<tbody>
<tr>
<td>Strategy compliance</td>
<td>Site is in accordance with the Preferred Strategy.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>HELAA Reference Number</th>
<th>TAT 005</th>
</tr>
</thead>
<tbody>
<tr>
<td>Address</td>
<td>Land to the rear of Paynesfield Road, Tatsfield</td>
</tr>
</tbody>
</table>
APPENDIX 3

FLOOD/DRAINAGE NOTE (CAMPBELL REITH – AUG 2019)
1.0 INTRODUCTION

1.1. **Brief**

1.1.1. CampbellReith have been appointed by Crest Nicholson to provide a high level analysis of the flood risk associated with a site at Smallfield, which is allocated in the Tandridge District Council Local Plan and is expected to provide up to 160 residential units.

1.2. **Site Location**

1.2.1. The site is located at Plough Road, Smallfield, Surrey RH6 9QR. The National Grid Reference for the site is centred on 142927N, 532024E. A site location plan is attached.

2.0 FLOOD STATUS

2.1. **Fluvial/Tidal Flooding**

2.1.1. Based on the flood map for planning on the Environment Agency website the site lies within Flood Zone 1 with less than 1 in 1000 (0.1%) annual probability of flooding.

2.1.2. Appendix C - Flood Zone Mapping of the Tandridge District Council Strategic Flood Risk Assessment (SFRA) also indicates that site is in within Flood Zone 1.

2.1.3. Appendix D – Climate change impact on fluvial flood risk of the SFRA indicates that the site is not affected by flooding in the 1% (1 in 100) plus climate change flood event.

Figure 1: Flood Zone Mapping
2.1.4. The proposed buildings and associated access and egress from both the buildings and the site will be located in the Flood Zone 1 and the assumed MORE VULNERABLE end use under the NPPF is appropriate in Flood Zone 1.

2.1.5. The majority of the site is at a LOW risk of flooding from fluvial / tidal sources

2.2. Surface Water Flooding

2.2.1. Surface water flooding is the term used to describe flooding which occurs when intense, often short duration rainfall is unable to be conveyed either directly into the ground or a drainage network, and as a consequence flows over ground on the surface causing flooding.

2.2.2. From the EA Online Flood map for Risk of Flooding from Surface Water there an extensive area of surface water flooding along the northern boundary adjacent Plough Road. This flooding ranges from HIGH risk (more than 3.3% chance of flooding occurring in any year) on the boundary and reduces to MEDIUM (between 1% and 3.3% chance of flooding occurring in any year) then LOW risk (between 0.1% and 1% chance of flooding in any year) flooding between 115m and 75m from the northern boundary. At the southern boundary of the first field there is also a HIGH risk strip of surface water flooding that crosses the site towards the pond in the neighbouring property to east. To the west of the site there is an area of LOW risk flooding which affects the assumed access from Redehall Road.
2.2.3. Appendix E – Risk of Flooding from Surface Water of the Tandridge District Council SFRA also indicates similar extents of surface water flooding.

2.2.4. As there is a large area of the site currently affected by LOW to HIGH risk of surface water flooding, any proposed development layout will need to take this into account to locate dwellings away from these areas.

2.2.5. The site is considered to be at a HIGH risk of surface water flooding.

2.3. Groundwater Flooding

2.3.1. Groundwater flooding is the emergence at surface level of water originating from a permeable sub surface stratum where the groundwater level rises above the local ground level.

2.3.2. Due to the site being underlain by Weald Clay it is unlikely that groundwater flooding would occur. This is reinforced by Appendix F – Areas at Risk of Ground Water Flooding of the Tandridge District Council SFRA which indicates that the site is in an area deemed as having negligible risk from groundwater flooding.

2.3.3. The site is considered to be at a LOW risk of groundwater flooding.
2.4. **Sewer Flooding**

2.4.1. Sewer flooding occurs where the local drainage system (foul or surface water) is overwhelmed by run off or foul water due to either lack of capacity or to maintenance issues such as blockages.

2.4.2. From Appendix I – Areas with recorded incidents of sewer flooding of the Tandridge District Council SFRA the site lies within an area with between 41 and 50 incidences of sewer flooding.

Figure 5: Sewer Flooding

2.4.3. It assumed that the site has no existing sewers on the site therefore it is assumed that sewer flooding will not have occurred in this location, however Thames Water should be consulted to determine the capacity of the public foul water sewers and its ability to accept the additional flows from any development.

2.4.4. It is considered that the site itself is at a LOW risk of sewer flooding however Thames Water should be consulted to determine the risk of sewer flooding occurring downstream.

2.5. **Artificial Sources**

2.5.1. The flood risk map for planning (reservoirs) on the EA website indicates that the site is not within an area at risk from reservoirs.

2.5.2. The Tandridge District Council Strategic Flood Risk Assessment states there are no canals, lakes or reservoirs within the Smallfield area and that this area is not at risk from flooding from Artificial Sources.

2.5.3. It is considered that the site is at a LOW risk of flooding from artificial sources.
Figure 1: Site Location

Client: Crest Nicholson

Broadbridge Farm, Smallfields
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 area

Flood zone 3

Flood zone 2

Flood zone 1

Flood defence

Main river

Flood storage area

Flood map for planning

Your reference

Plough Rd

Location (easting/northing)

532024/142927

Scale

1:2500

Created

23 Jul 2019 9:57